



# ROSEMERE NEIGHBORHOOD ASSOCIATION

P.O. Box 61471, Vancouver, WA 98666 [www.RosemereNA.org](http://www.RosemereNA.org) (360) 906-8810

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February 20, 2003

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Yasmin Yorker  
Office of Civil Rights  
U.S. Environmental Protection Agency  
Mail Code 1201A  
1200 Pennsylvania Ave NW  
Washington, D.C. 20460

Ms. Yorker,

The Rosemere Neighborhood Association has formally submitted a request for an investigation to you in regard to a Title VI and Environmental Justice complaint from Vancouver. A copy of the 28-page complaint has been received by you, as well as related maps. It is my understanding that these materials are sufficient for you to review to make a determination as to whether further investigation is warranted by your office, or by any other federal agency that may have jurisdiction. This document will also be forwarded to the Department of Transportation and HUD. I will send a hard copy of this cover letter in the mail to you.

I look forward to receiving some form of correspondence from you prior to our scheduled hearing date on March 6, 2003, at which time we will be appealing the permit decision on the Winkleman Apartment Complex before the Vancouver Planning Commission.

As the person who compiled this complaint, I will be the contact person representing the interests of the Rosemere Neighborhood Association. Feel free to call on me if you have any questions or concerns.

Thank you for your time in consideration of these matters.

Sincerely,

Dvija Michael Bertish, Chairman  
Rosemere Neighborhood Association  
(360) 906-8810

February 18, 2003

Kristina Miller  
 Supervisor of Complaint Intake  
 US Department of Housing and Urban Development  
 Fair Housing and Equal Opportunity  
 909 First Avenue  
 Suite 205  
 Seattle, WA 98104

Exhibit 1

Re: Title VI and Environmental Justice Complaints in Vancouver, WA

This document was prepared by:  
 Dvija Michael Bertish, Chairman  
 Rosemere Neighborhood Association  
 Box 61471  
 Vancouver, WA 98663  
 Phone: (360) 906-8810  
 [REDACTED]

Dear Ms. Miller:

This document was prepared by the Rosemere Neighborhood Association (RNA), which is staffed entirely by volunteers who reside in the Rosemere Neighborhood. Part of the RNA's mission, which is in keeping with the filing of this complaint, is to: "Encourage participation of all residents and to prohibit discrimination based on the following: race, religion, color, gender, national origin, marital status, familial status, income level, age, sexual orientation, disability, political ideology, ethnicity, gender identification, literacy, and the ability to speak English;" and to "Promote and encourage environmental awareness and preservation in Rosemere."

This document is arranged in two parts: I) A General Overview of the Complaint in Relation to 17 Affected Neighborhoods in West Vancouver; II) The Complaint as it Relates Specifically to the Rosemere Neighborhood.

## SECTION I

### A GENERAL OVERVIEW OF THE COMPLAINT AS IT RELATES TO 17 AFFECTED NEIGHBORHOODS IN WEST VANCOUVER:

**THE 17 NEIGHBORHOODS BEING: ROSEMERE, WEST MINNEHAHA, CENTRAL PARK, HUDSON'S BAY, FOURTH PLAIN VILLAGE, HARNEY HEIGHTS, BAGLEY DOWNS, MEADOW HOMES, OGDEN, OAKBROOK, VAN MALL, SHUMWAY, ARNADA, ESTHER SHORT, HOUGH, CARTER PARK AND LINCOLN**

The RNA of Vancouver, WA, has performed a study and based on the results of this study is requesting a federal investigation to identify the Title VI and Environmental Justice violations, as committed by the City of Vancouver via the **Vancouver Municipal Ordinance 20.95 --Transit Overlay District (TOD)**. This study alleges that the City of Vancouver has provided, and continues to provide municipal services in a discriminatory manner, the discrimination occurring against ethnic minorities and populations of poverty and low income who reside within the TOD. The RNA alleges that the City of Vancouver discriminates against the residents of the aforementioned 17 neighborhoods with respect to zoning, which in turn causes disproportionate negative socioeconomic impacts



on the residents of these neighborhoods. The zoning in question, which is part of the City of Vancouver's Urban Comprehensive Plan, employs the use of federal funds to maintain and operate the TOD.

The RNA has identified a variety of federal funding sources in the TOD, and therefore requests the U.S. Department of Housing and Urban Development, the U.S. Department of Transportation, and the Environmental Protection Agency to establish which federal agency or agencies have jurisdiction over this complaint. This study will clearly show how the application of identified federal funds within the TOD has contributed to the negative impacts of these neighborhoods. Pursuant to Title VI of the Civil Rights Act of 1964, Environmental Justice Under Executive Order Number 12898, and the Civil Rights Restoration Act of 1987, federal agencies are required to ensure that all federal-aid recipients, subrecipients, and contractors prevent discrimination and ensure nondiscrimination in all of their programs and activities, whether those programs and activities are federally funded or not.

The RNA has prepared demographic data to identify the ethnic minority and low income populations at risk due to the application of the TOD in West Vancouver. The demographic data included shows clearly that the populations at risk meet the benchmarks for EPA Title VI and Environmental Justice guidelines, which therefore merits further investigation at the Federal level. The data has been collected from the following sources: US Census Bureau 2000 Figures, The Vancouver Housing Authority, the Vancouver Police Department, the First Home Loan Program, C-TRAN and various departments within Vancouver City Government.

According to the City's Urban Comprehensive Plan (VMC Section 18.08.030), "The comprehensive land use plan reflects a carefully studied estimate of future land requirements for expansion and renewal, showing how development in the urban area should proceed in the future to insure the best possible physical environment for urban living, the most economic use of land, and the proper balance in use from a cost-revenue point of view." This study will show that the physical environment for these 17 neighborhoods has been adversely affected by the implementation of this plan, and that the design of the plan seeks to condemn the livability of the 17 neighborhoods with the intent of transforming them in means that cause ethnic and low-income discrimination, and that the City does not guarantee to provide amenities to these ethnic minority and low-income neighborhoods in an equitable fashion as it would guarantee to provide for neighborhoods that are distinctly within the white and upper class majorities.

### **Demographics of 17 Neighborhoods Contained Within the TOD**

#### **Chart #1**

**Poverty and Low-Income Populations Sorted By Descending "Percent Pop. Below Poverty"**  
**Taken from Census 2000 Data as provided by Vancouver Housing Authority**

| <b>Neighborhood</b>       | <b>Census Tract</b> | <b>Households that make 1.2X the State Average (EJ Threshold)</b> | <b>Percent of Households making below \$25,000 (EJ Avg. 24.37%)</b> | <b>Percent of Populous Un-Employed (State Avg 4.1%)</b> | <b>Percent of Populous below Poverty Line</b> | <b>All Active Section 8 Units</b> | <b>All Active Section 8 Units with Children</b> |
|---------------------------|---------------------|---|---|---|---|-----------------------------------|---|
| Bagley/<br>Meadow Homes   | 416.00              | YES   | 51.46%  | 10.3%   | 27.81%  | 123                               | 50  |
| Harney Heights            | 427.00              | YES   | 54.59%  | 11.0%   | 26.87%  | 129                               | 32  |
| Esther Short              | 424.00              | YES   | 84.57%  | 53.2%   | 25.21%  | 3                                 | 1   |
| Rosemere/<br>Fourth Plain | 417.00              | YES   | 40.92%  | 7.8%  | 22.83%  | 54                                | 24  |
| Rosemere                  | 418.00              | YES   | 39.50%  | 9.6%  | 21.46%  | 69                                | 27  |



|                              |        |     |        |       |        |            |            |
|------------------------------|--------|-----|--------|-------|--------|------------|------------|
| Central Park/<br>Hudsons Bay | 426.00 | YES | 43.09% | 7.1%  | 19.64% | 65         | 19         |
| Hough                        | 423.00 | YES | 45.10% | 7.5%  | 19.52% | 37         | 13         |
| Ogden/Van Mall               | 411.09 | YES | 33.47% | 8.7%  | 19.26% | 96         | 48         |
| Arnada/<br>Esther Short      | 425.00 | YES | 34.69% | 1.1%  | 16.13% | 10         | 2          |
| Ogden/Van Mall               | 411.08 | YES | 29.53% | 12.7% | 14.90% | 47         | 28         |
| Shumway/Lincoln              | 419.00 | YES | 35.70% | 8.4%  | 13.18% | 22         | 11         |
| West Minnehaha               | 410.02 | YES | 32.04% | 7.1%  | 12.89% | 66         | 28         |
| Bagley/<br>West Minnehaha    | 411.10 | YES | 22.10% | 3.2%  | 12.43% | 43         | 28         |
| Lincoln                      | 420.00 | YES | 21.52% | 1.6%  | 9.38%  | 1          | 1          |
| Carter Park/<br>Lincoln      | 421.00 | YES | 30.03% | 8.2%  | 9.07%  | 47         | 29         |
| Ogden/Oakbrook               | 412.03 | YES | 26.51% | 8.0%  | 9.06%  | 47         | 30         |
| Ogden                        | 412.05 | NO  | 22.61% | 3.2%  | 6.82%  | 36         | 21         |
| <b>Totals</b>                |        |     |        |       |        | <b>895</b> | <b>392</b> |

**Chart #2**

**Ethnic Minority Populations Sorted in Descending Order by "Percent Ethnic Minority"**  
**Taken From Census 2000 Data**

| <b>Neighborhood</b>             | <b>Census Tract</b> | <b>Total Populous</b> | <b>Non English Speaking at home (County Avg 11.5%)</b> | <b>Speak English Less than "Very Well" (County Avg 5.5%)</b> | <b>Total Non-White, Hispanic, Latino Populous</b> | <b>Percent Racial Minority</b> | <b>Percent Populous Using Public Transportation (County Avg 2.6%)</b> | <b>Percent Populous Car-pooling (County Avg 11.2%)</b> |
|---------------------------------|---------------------|-----------------------|--|--|---|--------------------------------|---|--|
| Rosemere/<br>Fourth Plain       | 417.00              | 4,073                 | 28.5%  | 19.6%  | 1,939   | 47.61%                         | 10.7%   | 20.7%  |
| Ogden/Van Mall                  | 411.09              | 6,070                 | 37.9%  | 27.5%  | 2,317   | 38.17%                         | 6.2%  | 16.7%  |
| Harney Heights                  | 427.00              | 4,154                 | 30.9%  | 22.5%  | 1,518   | 36.54%                         | 12.0%   | 23.0%  |
| Bagley Downs/<br>/Meadow Homes  | 416.00              | 3,847                 | 35.9%  | 26.9%  | 1,301   | 33.82%                         | 5.4%  | 15.0%  |
| Rosemere                        | 418.00              | 4,021                 | 19.5%  | 11.2%  | 1,065   | 26.49%                         | 4.8%  | 20.8%  |
| Ogden/Oakbrook                  | 412.03              | 4,028                 | 10.9%  | 4.8%   | 861   | 21.38%                         | 3.0%  | 13.4%  |
| Central Park/<br>Hudsons Bay    | 426.00              | 4,486                 | 15.8%  | 8.3%   | 909   | 20.26%                         | 3.8%  | 12.5%  |
| Hough                           | 423.00              | 2,776                 | 13.8%  | 6.1%   | 552   | 19.88%                         | 7.7%  | 12.2%  |
| Bagley Downs/<br>West Minnehaha | 411.10              | 4,891                 | 12.8%  | 7.5%   | 902   | 18.44%                         | 2.4%  | 14.3%  |
| Ogden/Van Mall                  | 411.08              | 5,310                 | 14.5%  | 9.1%   | 958   | 18.04%                         | 3.5%  | 15.1%  |
| West Minnehaha                  | 410.02              | 6,267                 | 8.9%   | 3.7%   | 1,058   | 16.88%                         | 2.6%  | 12.6%  |
| Ogden                           | 412.05              | 4,195                 | 16.7%  | 8.1%   | 686   | 16.35%                         | 1.9%  | 12.7%  |
| Esther Short                    | 424.00              | 1,448                 | 9.4%   | 3.8%   | 236   | 16.30%                         | 15.4%   | 0.0%   |
| Arnada/<br>Esther Short         | 425.00              | 1,116                 | 10.8%  | 0.8%   | 175   | 15.68%                         | 1.8%  | 16.3%  |



|                     |        |               |       |      |               |        |      |       |
|---------------------|--------|---------------|-------|------|---------------|--------|------|-------|
| Carter Park/Lincoln | 421.00 | 2,612         | 13.0% | 3.7% | 406           | 15.54% | 3.1% | 10.1% |
| Shumway/Lincoln     | 419.00 | 2,110         | 4.9%  | 1.6% | 261           | 12.37% | 7.0% | 10.1% |
| Lincoln             | 420.00 | 1,524         | 3.5%  | 0.4% | 185           | 12.14% | 3.5% | 15.7% |
| <b>Totals</b>       |        | <b>62,928</b> |       |      | <b>15,329</b> |        |      |       |

### Synopsis of Chart #1

- There are 84 total census tracts in Clark County.
- Thirteen of the most highly impoverished Census Tracts in Clark County are part of the TOD (inside city limits).
- Six of these most highly impoverished Census Tracts have a poverty population that exceeds 20%
- The highest concentration of section-8 housing in the county is within the most impoverished census tracts (inside city limits).
- All but one of these census tracts exceeds the Washington State Average Threshold of 24.37% for EPA Environmental Justice standards for locating possible Environmental Justice Communities.
- The neighborhoods that comprise the TOD qualify as an Environmental Justice Community.
- Thirteen of the Census Tracts show unemployment rates well above the county average of 5.9% and the state average of 4.1%.

### Synopsis of Chart #2

- Six neighborhoods contain populations where both low-income and minority factors are above 1.2X the state average: Rosemere, Fourth Plain Village, Bagley Downs, Harney Heights, Ogden and Central Park
- As entities within the TOD, these same six neighborhoods qualify sufficiently for a Title VI claim, while sixteen of the TOD neighborhoods qualify for an Environmental Justice claim.
- The highest concentration of ethnic minorities in the TOD is within the Rosemere and Fourth Plain Village Neighborhoods.
- 18% of Clark County's entire population lives in the neighborhoods in the TOD (inside the city limits)
- The most ethnic neighborhoods in this study also have the highest inability to speak English in the county.
- Clark County is 89% white majority (It was upwards of 96% white majority in 1990).
- 40% of all the racial minorities in Clark County live within the 17 neighborhoods that are included in the TOD (inside the city limits). There are 89 recognized neighborhoods in Clark County and 59 of them are in the city limits.
- Fourteen of these census tracts meet or greatly exceed the County Average of 2.6% for those who use public transportation.
- Fourteen of these census tracts meet or greatly exceed the County Average of 1.2% for those who carpool.
- The minority population in Clark County is concentrating its growth in the TOD neighborhoods (inside city limits), which are also the poorest neighborhoods in the county.
- The population of Russian immigrants, a large minority present in these neighborhoods, is not represented by the Census data as shown. Census figures include Russians within the "white" population. Russian immigrants may be found in the category concerning non-English speaking census tracts.

Please note: Census Tract boundaries do not match Vancouver neighborhood boundaries. The data in these charts approximates the comparison of the census tract boundaries to neighborhood boundaries as closely as possible. Census tract maps also do not correlate to the TOD maps. Many of the 17 neighborhoods in this study are completely engulfed by the TOD, but there are also several neighborhoods that are only included partially. For the purposes of this study, the data from all neighborhoods (or census tracts) that are touched by the TOD are counted in their entirety, even if the entire neighborhood is not within the boundaries of the TOD. This is done with the understanding that the affects of the TOD reach beyond hypothetically drawn boundaries that define the TOD in map form.



**Chart #3****Crime Rate Statistics Organized by Neighborhood in the TOD****Sorted By "Incidents Per 1000 Person 2001" in Descending Order****Data Provided by Vancouver Police Department Analysts**

| <b>Neighborhood</b>    | <b>Total<br/>Populous</b> | <b>Number<br/>of Crime<br/>Incidents<br/>2001</b> | <b>Incidents<br/>Per 1000<br/>Persons<br/>2001</b> | <b>Number<br/>Crime<br/>Incidents<br/>First Qtr.<br/>2002</b> | <b>Incidents<br/>Per 1000<br/>Persons<br/>First Qtr.<br/>2002</b> | <b>Number<br/>Crime<br/>Incidents<br/>Second<br/>Qtr. 2002</b> | <b>Incidents<br/>Per 1000<br/>Persons<br/>Second<br/>Qtr. 2002</b> |
|------------------------|---------------------------|---|--|---|---|--|--|
| Bagley Downs           | N/A                       | N/A   | N/A  | N/A   | N/A   | N/A  | N/A  |
| Esther Short           | 374                       | 894   | 2,390.87   | 269   | 719.25  | 303  | 810.16   |
| Meadow Homes           | 1,016                     | 520   | 511.81   | 179   | 176.18  | 190  | 187.01   |
| Arnada                 | 973                       | 312   | 320.66   | 61  | 62.69   | 88   | 90.44  |
| Van Mall               | 4,699                     | 1,493   | 317.73   | 459   | 97.68   | 375  | 79.80  |
| Ogden                  | 3,492                     | 960   | 274.91   | 305   | 87.34   | 279  | 79.90  |
| Hudson's Bay           | 1,346                     | 314   | 233.28   | 52  | 38.63   | 97   | 72.07  |
| Hough                  | 2,425                     | 544   | 224.33   | 180   | 74.23   | 171  | 70.52  |
| Shumway                | 1,126                     | 251   | 222.91   | 109   | 96.80   | 83   | 73.71  |
| Rosemere               | 5,567                     | 1,103   | 198.13   | 357   | 64.13   | 363  | 65.21  |
| Harney Heights         | 5,575                     | 961   | 172.38   | 285   | 51.12   | 343  | 61.52  |
| West Minnehaha         | 2,966                     | 426   | 143.63   | 161   | 54.28   | 154  | 51.92  |
| Lincoln                | 3,332                     | 472   | 141.66   | 139   | 41.72   | 121  | 36.31  |
| Central Park           | 2,251                     | 301   | 133.72   | 141   | 62.64   | 140  | 62.19  |
| Fourth Plain Vlg.      | 2,579                     | 339   | 131.45   | 113   | 43.82   | 156  | 60.49  |
| Carter Park            | 2,453                     | 298   | 121.48   | 73  | 29.76   | 99   | 40.36  |
| Oakbrook               | 2,583                     | 234   | 90.59  | 70  | 27.10   | 104  | 40.26  |
| <b>Totals</b>          | <b>42,757</b>             | <b>9,422</b>                                      |  | <b>2,953</b>  |   | <b>3,066</b>   |  |
| <b>County Averages</b> |                           |   | <b>104.44</b>                                      |   | <b>43.30</b>  |  | <b>44.76</b>   |

**Synopsis of Chart #3**

- 34% of all the incidents of crime recorded by the Law Enforcement in Clark County occurs in the TOD (inside the city limits)
- There is a 13% increase in incidents of crime from 2001 to the first half of 2002 in the TOD (inside city limits)
- All but one neighborhood's crime rate in the TOD was above the County Average in 2001, most well above the County Average in 2002 – ranging from 115%-490% above average (excluding Esther Short)
- The TOD neighborhoods rank among the very highest crime rates in all of Clark County (89 Neighborhoods county-wide)
- This chart indicates those neighborhoods that have the most poverty, and the highest percentages of ethnic minority populations also experience the highest levels of crime.

One of the largest elements of the incidents of crime in the area is drug trafficking, sale and use. Residents have repeatedly discussed the dangers surrounding the production of Methamphetamine with City Council and City Management, including the Meth Task Force, but to date the process of field testing housing units for residues of Methamphetamine is not being done. "Meth Busts" occur frequently in the TOD. As a result of this drug trafficking, used hypodermic syringes are often found discarded on the ground where children have been known to



retrieve them and play with them. Within the past few months, children were seen playing with used syringes, filling them with water and using them as squirtguns – the children were spraying water in each other's faces. Both the Southwest Washington Health District and the Meth Task Force were informed of this terribly dangerous situation, and requested assistance with sharps containers as a means of controlling the discarded syringes, but to date there has been nothing done with the exception of light discussion in committee meetings.

### **Subsidized Housing Applied to Neighborhoods Within the TOD**

#### **Chart #4**

**Federal Aid Received by Residents organized by Zip Code**  
**Data Provided by the Vancouver Housing Authority and**  
**The First Time Home Buyer's Program**

| <b>Zip Code</b> | <b>Section 8 Units</b> | <b>Federal Funds Applied to Section 8</b> | <b>Section 8 Units With Children</b> | <b>First Time Home Buyer Loans</b> | <b>Federal Funds Applied to Home Buyer Loans</b> |
|-----------------|------------------------|---|--------------------------------------|------------------------------------|--|
| 98642           | 6                      | \$2,928                                   | 6                                    | 1                                  | \$20,053   |
| 98661           | 566                    | \$276,208                                 | 223                                  | 48                                 | \$962,544  |
| 98662           | 129                    | \$62,952                                  | 88                                   | 35                                 | \$701,855  |
| 98663           | 134                    | \$65,392                                  | 63                                   | 27                                 | \$541,431  |
| 98665           | 178                    | \$86,864                                  | 71                                   | 6                                  | \$120,318  |
| 98685           | 71                     | \$34,648                                  | 22                                   | 2                                  | \$40,106   |
| 98686           | 29                     | \$14,152                                  | 18                                   | 3                                  | \$60,159   |
| <b>Totals</b>   | <b>1113</b>            | <b>\$543,144</b>                          | <b>491</b>                           | <b>122</b>                         | <b>\$2,446,466</b>                               |

#### **Synopsis of Chart #4**

- 39% of all the Subsidized First Time Home Buyer's Loans that exist in Clark County (inside the city limits) occur within the TOD neighborhoods (inside the city limits). There are additional subsidized homes in the unincorporated neighborhoods that are also in the TOD. The First Time Home Buyer's Program was established in 1996.
- 57% of all the active subsidized Section-8 vouchers in Clark County (inside the city limits) occur within the TOD neighborhoods (inside the city limits). There are additional Section-8 vouchers in the unincorporated neighborhoods that are also in the TOD.
- These funds have leveraged approximately \$28 million in private dollars into the community through 1<sup>st</sup> mortgage loans, buyer and seller participation in the loan through closing costs and seller concessions through the purchase and sale agreement process.
- The program average for a "silent second mortgage" is \$20,053 with the average 1<sup>st</sup> with the average 1st mortgage loan amount at \$84,283.

#### **Chart #5**

**Housing Statistics from Census 2000**  
**Owner Occupied vs. Renter Occupied for 2000 &**  
**Hooked to Sewer vs. Not Hooked to Sewer 1999**

| <b>Neighborhood</b> | <b>Census Tract 2000</b> | <b>Owner Occupied 2000</b> | <b>Renter Occupied 2000</b> | <b>On Sewer 1990</b> | <b>Not on Sewer 1990</b> | <b>Tract Number 1990</b> |
|---------------------|--------------------------|----------------------------|-----------------------------|----------------------|--------------------------|--------------------------|
|---------------------|--------------------------|----------------------------|-----------------------------|----------------------|--------------------------|--------------------------|

| (County Totals)               |        | 64.3% | 35.7% | 61,212        | 31,329       |        |
|-------------------------------|--------|-------|-------|---------------|--------------|--------|
| W Minnehaha                   | 410.02 | 56.2% | 43.8% | 2,091         | 256          |        |
| Ogden/Van Mall                | 411.08 | 36.4% | 63.6% | 1,284         | 283          | 411.03 |
| Ogden/Van Mall                | 411.09 | 56.2% | 43.8% | 410           | 410          | 411.06 |
| Bagley/<br>West Minnehaha     | 411.10 |       |       |               |              | 411.06 |
| Ogden/Oakbrook                | 412.03 | 56.0% | 44.0% | 1,056         | 370          |        |
| Ogden                         | 412.05 | 49.4% | 50.6% | 2,155         | 736          | 412.04 |
| Bagley Downs/<br>Meadow Homes | 416.00 | 27.2% | 72.8% | 1,160         | 55           |        |
| Rosemere/<br>Fourth Plain Vlg | 417.00 | 32.1% | 67.9% | 1,565         | 55           |        |
| Rosemere                      | 418.00 | 47.7% | 52.3% | 1,540         | 89           |        |
| Shumway/Lincoln               | 419.00 | 43.5% | 56.5% | 1,052         | 20           |        |
| Lincoln                       | 420.00 | 68.6% | 31.4% | 610           | 4            |        |
| Carter Park/<br>Lincoln       | 421.00 | 56.0% | 44.0% | 1,128         | 7            |        |
| Hough                         | 423.00 | 36.6% | 63.4% | 1,398         | 20           |        |
| Esther Short                  | 424.00 | 1.7%  | 98.3% | 450           | 0            |        |
| Arnada/<br>Esther Short       | 425.00 | 39.3% | 60.7% | 647           | 0            |        |
| Central Park<br>Hudsons Bay   | 426.00 | 30.7% | 69.3% | 1,957         | 80           |        |
| Harney Heights                | 427.00 | 20.0% | 80.0% | 1,903         | 38           |        |
| <b>Totals</b>                 |        |       |       | <b>20,406</b> | <b>2,423</b> |        |

### Additional Information on Sewers

- From Volume II of the City's Growth Management Plan -- Policy #82: New on-site sewage treatment systems are discouraged within the Vancouver urban area; Policy #83: Existing on-site sewage treatment systems should be converted to sewer service when it becomes available. Until sewer service becomes available, certain limitations on the use of properties with on-site sewage treatment systems should be imposed to protect the public health and welfare (see Implementation Measure #IM78). Programs to ease the transition to the sewer service should be developed; Implementation Measure #78: When a change in use is proposed or an application for an industrial or commercial development received, the Business Identification Reporting Database shall be used to determine compatibility with an existing on-site sewage treatment system. If the use is not compatible, connection to the sewer service shall be required at the owner's expense.
- Residents are currently required to pay for sewer hookup to the City's sewer system. The homeowner needs to pay the system development fee (\$1,999.00) and the application fee (25.00) plus any latecomer fees (amounts vary) prior to any permits being issued. The plumbing permit (\$80.12) will allow the connection from the right of way line (typically behind the sidewalk) to the house and abandonment of the septic. If there is no stub from the street to the right of way line a "Right of Way" permit must be obtained by an approved contractor to cut the street and tap the main. The City has a financial plan for single family residences. It consists of a 20-year (monthly payment) plan at approximately 6.5% with no pre-payment penalty but the loan must be paid off at the sale of the property. If there is no sewer main a petition can be given to the City and if the interest is great enough the City may build a sewer main. In that case each homeowner would pay their fair share of the construction cost when they hook up.



- A city engineer, responsible for sewer, water, drainage and transportation improvements, is not aware of any formal timelines to convert those on septic tanks to city sewer systems. The Health District is the governing body that makes the determination if a facility should be on public sewer, or if a facility can utilize a private system.
- The poverty and low-income population may not be able to afford the cost of sewer hookup, or even the cost of regular service to upkeep septic tanks. Many residents who do not currently have city sewer service want this service. A prerequisite for high urban density development would be a complete sewer and drainage network for all residents. There may be serious groundwater or ecosystem contamination due to unmanaged septic tanks in the TOD, especially with absentee landlords in charge of the very high percentage of rental units. An audit should be performed to determine how many households are still without sewer service.

#### Synopsis of Chart #5

- 2000 Census Tracts were re-designed – they do not consistently match 1990 Census Tracts
- There is no data regarding sewer service in the 2000 Census
- All but one of these census tracts is well below the county average for owner-occupied homes.
- All but one of these census tracts meets or greatly exceeds the county average for rentals.
- 33.9% of all households in Clark County did not have sewer service in 1990.
- 10.6% of all households in the current TOD did not have sewer service in 1990.
- The city has no timetable for sewer service upgrades

#### Chart #6

**Estimated C-TRAN Ridership along the Fourth Plain Corridor  
Cross-Town Route Through TOD, Bus Route 4  
Provided by C-TRAN**

| Bus Stop Location           | East-Bound<br>boarding | East-bound<br>deboarding | Bus Stop Location        | West-bound<br>boarding | West-bound<br>deboarding |
|-----------------------------|------------------------|--------------------------|--------------------------|------------------------|--------------------------|
| E 37th & Main               | 568                    | 126                      | Van Mall & NE 94th Ave   | 397                    | 77                       |
| Main & 9th                  | 19                     | 1                        | Van Mall & 94th Ave      | 56                     | 3                        |
| Main & 11th                 | 23                     | 3                        | 4th Plain & Spokane      | 4                      | 0                        |
| Main & 13th                 | 41                     | 8                        | 4th Plain & Thurston     | 25                     | 0                        |
| Main & 16 <sup>th</sup>     | 10                     | 4                        | 4th Plain & Pacific      | 6                      | 3                        |
| Main & McGlothlin           | 6                      | 11                       | 4th Plain & 78th Ave     | 102                    | 31                       |
| Broadway & 29 <sup>th</sup> | 13                     | 4                        | 4th Plain & Boston Chick | 14                     | 4                        |
| Broadway & 22 <sup>nd</sup> | 23                     | 11                       | 4th Plain & 72nd Ave     | 44                     | 17                       |
| Broadway & 25 <sup>th</sup> | 86                     | 22                       | 4th Plain & NE Andresen  | 33                     | 14                       |
| 4th Plain & D               | 17                     | 0                        | 4th Plain & 65th Ave     | 64                     | 18                       |
| 4th Plain & F               | 6                      | 12                       | 4th Plain & 62nd Ave     | 45                     | 16                       |
| 4th Plain & O               | 8                      | 9                        | 4th Plain & Kyocera      | 22                     | 20                       |
| 4th Plain & VA Medical      | 39                     | 62                       | 4th Plain & 57th Ave     | 32                     | 7                        |
| 4th Plain & T               | 37                     | 44                       | Stapleton & Pan Terra    | 21                     | 22                       |
| 4th Plain & Fort Van Way    | 93                     | 41                       | Plomondon & Stapleton    | 19                     | 14                       |
| 4th Plain & Z               | 16                     | 21                       | Plomondon & Spaulding    | 20                     | 2                        |
| 4th Plain & Grand Blvd      | 74                     | 58                       | Plomondon & Spaulding    | 19                     | 13                       |
| 4th Plain & Laurel Place    | 33                     | 39                       | Caples & Post Office     | 34                     | 17                       |

|                              |             |             |                             |             |             |
|------------------------------|-------------|-------------|-----------------------------|-------------|-------------|
| 4th Plain & Todd Rd          | 26          | 34          | 4th Plain & Wintler Dr      | 28          | 15          |
| 4th Plain & Brandt Rd        | 26          | 10          | 4th Plain & Falk Rd         | 31          | 12          |
| 4th Plain & Falk Rd          | 18          | 37          | 4th Plain & Evergreen Pk    | 56          | 48          |
| Caples & Post Office         | 25          | 48          | 4th Plain & Neals Lane      | 23          | 14          |
| Plomondon & Caples           | 5           | 19          | 4th Plain & Norris          | 25          | 14          |
| Plomondon & Spaulding        | 9           | 36          | 4th Plain & Grand Blvd      | 84          | 71          |
| Plomondon & Stapleton        | 15          | 27          | 4th Plain & Z               | 16          | 19          |
| Stapleton & Pan Terra        | 27          | 28          | 4th Plain & Fort Van Way    | 47          | 58          |
| 4th Plain & 57 <sup>th</sup> | 11          | 11          | 4th Plain & T               | 57          | 38          |
| 4th Plain & Kyocera          | 23          | 30          | 4th Plain & O               | 53          | 25          |
| 4th Plain & 62nd Ave         | 14          | 26          | 4th Plain & F               | 14          | 31          |
| 4th Plain & 65th Ave         | 28          | 79          | Main & 24 <sup>th</sup>     | 29          | 99          |
| 4th Plain & Andresen         | 7           | 50          | Main & 23 <sup>rd</sup>     | 15          | 17          |
| 4th Plain & NE Andresen      | 14          | 29          | Main & 20 <sup>th</sup>     | 8           | 20          |
| 4th Plain & Andresen         | 6           | 15          | Broadway & 16 <sup>th</sup> | 3           | 18          |
| 4th Plain & Burton Rd        | 17          | 30          | Broadway & Mill Plain       | 4           | 16          |
| 4th Plain & 78th Ave         | 22          | 65          | Broadway & 13 <sup>th</sup> | 4           | 72          |
| 4th Plain & Family Tree      | 8           | 11          | Broadway & 11 <sup>th</sup> | 2           | 17          |
| 4th Plain & Moose Lodge      | 1           | 8           | Broadway & 8 <sup>th</sup>  | 0           | 50          |
| 4th Plain & 86th Ave         | 2           | 10          | E 7th & Main                | 78          | 500         |
| 4th Plain & Royal Oaks       | 3           | 17          |                             |             |             |
| 4th Plain & Spokane          | 1           | 3           |                             |             |             |
| Van Mall Dr & 94th Ave       | 1           | 60          |                             |             |             |
| Van Mall Dr & NE 94th Ave    | 90          | 369         |                             |             |             |
| <b>TOTALS</b>                | <b>1511</b> | <b>1528</b> |                             | <b>1534</b> | <b>1432</b> |

#### Additional Statistics for Chart #6

- Approximately 6005 riders use this mass transit corridor during the weekday – the main TOD route. These figures indicate total one way trips, not round trips. Actual number of people riding the bus may be only half of this total figure if total round trips are considered.
- Ridership on this route is 17.8% of seated capacity from 5:00am-7:00pm
- Ridership on this route is 24.7% of total C-TRAN weekday totals – This percentage is nearly equal to the 25% reduction of required parking for new building regulations in the TOD. Ridership is highest in the TOD than elsewhere in the city, even without extensive high-density urban development since the TOD was implemented.
- There are 56 round trips on Fourth Plain Blvd. route each weekday
- Buses run every 15 minutes from 5:10am – 7:00pm, with additional service until 10:00pm
- Maximum seating per bus is 43, Standing room 17
- Average C-TRAN 2002 weekday ridership in the county is 24,537
- Average C-TRAN 2002 weekday ridership in the city is 19,300 (excludes fair service, commuter service, rural service)
- There are 1,897 bus stops in the C-TRAN system.
- There are 79 stops on Bus Route 4, or just over 4% of the total stops.

#### Transit Overlay District – Vancouver Municipal Ordinance 20.95

#### Verbiage From the TOD Vancouver Municipal Ordinance



"It is the purpose of the Transit Overlay District to improve mobility by providing for pedestrian and transit friendly development through a mix of residential, commercial and employment opportunities that focus appropriate densities and design characteristics within the designated transit corridors. Specifically, the Transit Overlay District is intended to:

- A. Carry out the goals and objectives of the Community Framework plan and the Vancouver Urban Area Comprehensive Plan;
- B. Provide densities that encourage mixed-use development within the transit corridor and support multi-modal transportation facilities including high capacity transit;
- C. Encourage infill and reinvestment in the urban area while adding to the quality of life;
- D. Create safe, attractive and convenient access for transit users, pedestrians, bicyclists, and others through building and site design;
- E. Reduce conflicts between pedestrians, bicyclists and vehicles;
- F. Reduce automobile trips and reliance on the single-occupant vehicle by discouraging auto-oriented uses and encouraging alternative modes of transportation;
- G. Promote livability, commerce and neighborhood vitality;
- H. Reinforce public investments with private development;
- I. Provide for transit overlay concepts while reflecting market forces;
- J. Target overlay concepts to different areas within the Transit Overlay District;
- K. Promote land use patterns and designs identified through the Visual Preference Survey process.
- L. Provide a voluntary and incentive-based ordinance that both encourages pedestrian and transit oriented design elements and furnishes flexibility. (Ord. M-3283 § 1, 1997)

### **Rebuttal to the "Purpose of The TOD" Ordinance**

The TOD operates among four major arterial routes on the west side of Vancouver: Interstate 5, Fourth Plain Blvd., State Route 500, and Interstate 205. There are a number of neighborhoods that are completely engulfed by the TOD, many of which contain R-30 zones. According to John Karpinski, an environmental attorney who helped to establish the methodology behind the TOD, the design of the ordinance was not intended to be used within residential areas. The focus of the TOD was originally intended to increase the density of specified commercial areas only in order to build commercial centers that would better serve the surrounding communities. City staff altered the original intent of the TOD to include a vast area of residential parcels, thus adversely affecting the livability of all the residential neighborhoods that exist along the transit corridors within the TOD. This is particularly problematic for those areas zoned R-30, high density residential with some non-residential uses.

The area within the TOD is underserved by the city and the Urban Comprehensive Plan, which is a direct result of the implementation of the Growth Management Act (GMA). The GMA's goal is to infill and develop the urban area while keeping the city's boundary from expanding. Clark County is one of the fastest growing populations in the state of Washington, and the population of Vancouver is growing very rapidly as well. The GMA was intended to operate in concert with surrounding cities in the county like Camas and Washougal, especially in regard to high density development, but those cities have elected not to pursue the high density development plan like Vancouver has, regardless of the GMA's mandate to do so. In order to prevent urban sprawl, the GMA guidelines specify the need for high-density urban development. Generally, such development would occur on vacant parcels, but with the decline of available parcels on which to build, infill becomes the goal. Neighborhood leaders have approached the City Council to request that the urban borders should be increased in order to accommodate the rapid growth, but the request has been refused many times in favor of infill.

Infill within established neighborhoods that are already underserved causes urban blight and the propagation of ghettos and slums. Certain pockets within the West Side neighborhoods are considered undesirable and problematic, places unsafe to raise a family, and those who live here are generally those who cannot afford to live elsewhere. These neighborhoods are therefore seen as a "cast-off" society and a nuisance where the disadvantaged and disenfranchised people live. Many neighborhood leaders have been working for years to improve the area's



reputation, and tremendous improvements have been made, but the City's discriminatory practices, such as the implementation of the TOD, simply annihilate the many efforts the residents have put toward community stewardship. This needs to be corrected so that we can again begin to regenerate and renovate, and build a proper place to live. The city must be accountable for its actions, especially the propagation of discrimination.

The intent behind the TOD ordinance is to create high density "urban centers" supported by transit nodes and corridors. The justification for this methodology is that high-density development will ultimately catalyze the increased use of public transportation and will also lesson the amount of automobile trips within the overlay district. Thus, zoning incentives are included in the overlay district to attract high-density multi-family development on parcels that are adjacent to the transit corridor. The population of the TOD is already concentrated, representing 18% of the County's population (within the city limits). The TOD ordinance is not applied elsewhere in the city – it is only applied in West Vancouver, mostly along the Fourth Plain Blvd. corridor. This area represents the older and more established neighborhoods, as well as the poorest, the most racially diverse, the most crime-ridden, the most unemployed, and the most at risk for industrial pollution and contamination.

Prerequisites to high-density urban development are complete sewer networks, sidewalks and curbs, drainage control systems, and traffic calming devices to name a few. These amenities, which are commonplace in newer and wealthier all white neighborhoods, are sadly lacking in the TOD. This overlay ordinance actually seeks to cram more people in a tighter space while providing substandard service, and it does so while allowing relaxed building codes, especially in regard to parking requirements and setbacks. The TOD allows for a 25% decrease in parking in areas that do not have sidewalks, curbs, gutters, drainage or sufficient traffic calming. Furthermore, the ordinance allows for increased density on less land while allowing developers to claim the frontage area on the street to be considered as part of the required parking. No where else is street parking reserved in such a manner in a residential area.

The Transit Overlay District Ordinance, established in 1996, was later amended in 1997 to make it a voluntary, or discretionary ordinance – it is not mandatory for the regulations specified by this ordinance to be applied to every parcel located within the boundaries of the overlay district, but it can be applied to every parcel nonetheless. Developers may take advantage of the incentives offered by the TOD if they so desire, as long as they abide by the conditions required by the ordinance. The TOD is subdivided into two categories: Tier 1 (high-density development) and Tier 2 (increased density development).

Under the regulations of this ordinance, a low-income family may qualify for a government subsidized home loan and purchase this home within the TOD, only to have a developer purchase the home next-door and raze the structure in order to build an apartment complex on a parcel where a single family home once stood. The building of this new apartment complex, permitted by the ordinance, would adversely affect the property values and the livability standards of the government subsidized home, but neither of these values are applicable to the level of the law because they are variable values that cannot be legislated. The subsidized homeowners would then be stuck with a 30 year loan, living next to an apartment complex they do not want because they cannot afford to buy a home anywhere else, while overflow parking from the apartment complex fills their front yard because they don't have sidewalks or curbs, all the while the desirability of their property decreases with each drug bust that occurs at the apartment complex next door. To make matters worse, the regulations of the ordinance allow the developer to enjoy relaxed building codes, particularly in relation to setbacks, parking, and density, which ultimately destroy the safety of the neighborhood. Furthermore, the TOD permits non-residential uses for existing parcels, even within a residential community. The TOD permits commercial or mixed-use buildings to be established in predominantly residential areas, businesses that would also enjoy the benefit of relaxed building codes, all to the detriment of the neighborhoods. So, if our subsidized household is within an R-30 zone, it could end up with an apartment complex on one side and a hardware store on the other, and the Planning Commission would say "There is nothing we can do about it, though we recognize it is a problem." Such zoning would be the ruination of any residential landscape.



Even without the implementation of developments along the Fourth Plain Blvd. transit corridor, it is important to note that Census data clearly shows that residents within the TOD are conscientious car-poolers and users of public transportation. In fact, these TOD neighborhoods are ranked among the highest in Clark County of those who carpool and ride the bus. However, the passage of State Initiative 695 will cause large budget cuts within the C-TRAN system, and the availability of public transportation will be curtailed. C-TRAN is currently spending down its reserve, and may face serious budgetary constraints that will further impede the use of public transportation throughout the TOD.

Traffic engineers maintain that the TOD, in combination with high urban density zoning, is designed to lessen cross traffic, speeding, and traffic volumes in the residential areas. This is ludicrous when one realizes that these neighborhoods are sandwiched in between major cross-town arterials (State Route 500 and Fourth Plain Blvd. and I-5) and drivers constantly cut through the neighborhoods to gain access to these arterials. One of the most frequent complaints neighborhood leaders receive is about speeding in the neighborhood. The Rosemere neighborhood suffered a tremendous loss with the deaths of two children, a brother and sister, who were both killed by a speeding driver while walking on a connector arterial street that connects to SR-500 – this street does not have sidewalks or curbs, is double wide, and causes continual speeding through the heart of a residential area due to poor design and construction. The only option the neighborhood has to correct the problem is to compete for CDBG funds, a time-consuming and detailed process that can take years to accomplish. This process does not address the immediacy of the dangers inherent in poor traffic management.

The zoning of the TOD is completely ineffectual in controlling traffic patterns, speeding, and traffic volume, or even in increasing the use of mass transit. The TOD merely “assumes” these improvements will occur simply because the ordinance exists, even without tools in place to enforce elements of the ordinance. The ordinance does not provide a means for making sure that people who live in high urban density zones within the TOD will park fewer cars, drive less, or rely on the bus more often. For those of us who live in these neighborhoods, that assumption is not only false, but it is also discriminatory and it degrades the livability of our community.

Zoning practices are a very complex and invasive element to neighborhood life. In a situation where a large part of the population does not speak English, it is important to provide accurate and competent translation services in order for residents to fully understand their rights. The Rosemere Neighborhood Association is the only neighborhood association that translates its monthly newsletter in order to help bridge this communication gap, and it has been doing so for nearly two years. Through volunteerism, the Rosemere newsletter is translated into Spanish and Russian. Elementary schools within the TOD have noted the need for and the lack of translation services. The City of Vancouver does not provide regular translation services in public forums or in printed materials, and therefore, the non-English-speaking population is unaware of how to voice their concerns, especially in regard to an issue as important as the TOD. The Vancouver Area Urban Comprehensive Plan does not account for impacts to racial minority populations and low income populations as caused by the TOD.

Burnt Bridge Creek, a natural waterway, runs right through the middle of the TOD. The residents of the TOD support the creek with property taxes, yet the creek and its habitat are polluted. Plans are being considered for the creek’s clean up and rehabilitation, possibly including the development of a nature trail. During the I-5 widening process at Burnt Bridge Creek, the Washington Department of Transportation installed environmental protective devices designed to preserve the ecology of the creek and to protect it from pollution carried by run-off drainage from the Interstate. An ecological study may be necessary to determine if pollutants are being carried into the creek due to the lack of run-off control and the lack of a drainage network in the neighborhoods. In building permit documentation regarding building plans within the TOD, site plan reviewers identify catch basins on parcels of property, but “it is unclear where the catch basins drain to.”

There have not been sufficient studies performed to determine environmental risks within the TOD, in spite of the fact that there are a number of identified severe environmental impact cases as listed by the EPA: two chrome



plating plants on Vancouver's West have been condemned as EPA Superfund sites, both of which have contaminated the water table with toxic chemicals. Stored pollutants have leaked into the water table at the Ross Island Substation (Bonneville Power Administration), and Vancouver Water Station #1 in the Rosemere district was also contaminated with carcinogens. It is possible that seepage from any of these contaminated sites could have affected the water quality of Burnt Bridge Creek, and this should be investigated. Among a large number of industrial facilities that are placed within a two-mile radius of the TOD, the EPA has recorded 645 instances of major and/or minor incidents of contamination. Clearly, environmental contamination is a huge risk to the neighborhoods of the TOD. Five major cases from the EPA's National Priority List regarding contamination in Clark County are located within the radial perimeter of the TOD.

### **Federal Funds That Have Been Applied within or near the TOD**

- **Environmental Protection Agency -- \$2,300,000**

Cleanup of Superfund site for Boomsnub BOC Gases Corporation, a chrome-plating plant.

- **Environmental Protection Agency -- \$3,000,000 (an additional \$5,000,000 expected)**

Cleanup of Superfund site for Frontier Hard Chrome. Discharge of toxic wastewater into a dry well.

- **Section 8 Funds -- 1113 subsidized units for a total of \$543,144**

These funds come from the US Department of Housing and Urban Development (HUD). HUD contracts with the Vancouver Housing Authority to operate the program and provide the funds. The Vancouver Housing Authority is reimbursed for the housing assistance paid to landlords plus an administrative fee of about 9%.

- **First Time Home Buyer's Program -- 122 subsidized home loans for an approximate total of \$2,421,700**

To date this program has received \$6.1 million dollars in direct funding to make these loans countywide. The funds come from a variety of public funded grants including the following: City CDBG Funds, Clark County CDBG Funds, Clark County HOME Funds, and Washington State Housing Trust Funds. All funded grants are awarded through a competitive grant process. These funds have leveraged approximately \$28 million in private dollars into the community through 1st mortgage loans, buyer and seller participation in the loan through closing costs and seller concessions through the purchase and sale agreement process. The program average for a "silent second mortgage" is \$20,053 with the average 1st with the average 1st mortgage loan amount at \$84,283.

- **C-TRAN Mass Transit -- \$3,030,000 yearly**

C-TRAN receives an annual allocation from the Federal Transit Authority (FTA) which varies from year to year. C-TRAN is currently using about \$3 million per year for reimbursement of maintenance expenses. In addition, about \$30,000 per year is designated as "transit enhancement" funds and is intended to improve things like shelters, enhanced ADA access, etc. Both these amounts require 20% local matching funds.

- **Washington State Department of Transportation -- State and Federal Funds, \$65,419,000**

- **I-5 Corridor Improvements, NE 78th Street in Hazel Dell to Burnt Bridge Creek in Vancouver**

The environmental measures used in this project include: Installation of silt fencing as general protection anywhere earthwork is taking place; Installation of straw bale barriers to prevent sediment from flowing in ditches or other areas where runoff was more concentrated; Installation of sediment traps on catch basins to protect the storm sewer system from sediment. Placement of straw, matting and seeding to protect large slopes from eroding; Construction of two ponds to prevent pollutants from entering Burnt Bridge Creek near Leverich Park.

- **Transportation Improvement Funds**



There have been a variety of street improvements made to the Fourth Plain Blvd, including the rebuild of intersections, paving, and traffic flow alteration. There have also been a number of improvements to SR-500, especially overpasses built at Thurston Way, and Andresen, which are in the TOD. Various CDBG funds have been allocated to sidewalk and ramp projects throughout the corridor.

## **SECTION II - ROSEMERE**

### **Case Study in Rosemere Neighborhood – the Winkleman Apartment Complex** **Project AU974357/PSR2002-0039**

The entire study of the TOD neighborhoods was prompted by the public outcry resulted from the development of the Winkleman Apartment Complex. The Rosemere Neighborhood Association received many calls and letters from residents who are vehemently opposed to the development of this complex and the letters will become part of the record on file with the Planning Commission. The proposed complex is designed for a vacant lot situated between a single family home and a duplex.

The proposed Winkleman Apartment Complex (10 units), to be developed at 2614 'O' street, has been granted preliminary building approval by the City of Vancouver's Development Review Services (DRS). According to Patti McEllrath, Associate Planner & Case Manager, DRS must grant every permit application if it meets all specifications as required by the Vancouver Municipal Code. The Winkleman project has been granted preliminary site plan approval with 28 conditions.

The RNA, representing its membership, submitted petitions & letters to DRS stating objections to the building of this complex. All petitions & letters were included in the official findings during the permit process, and are included in the Staff Report & Decision from the City of Vancouver. The RNA, by majority vote at the October 2002 general meeting, decided to pursue an appeal for this building permit. The RNA also voted to spend the \$75 to file the appeal to a hearings examiner. Various officials & community representatives that were questioned about this permit stated that quality of life issues (such as adjacent property values) & emotional appeals from neighbors (including petition signatures) are not applicable to the decision to grant or deny the permit since they do not pertain to the level of the law.

The Decision, as published by the City of Vancouver reads: "The proposed development is permitted outright. Based upon the findings & conclusions herein, the criteria for approval have been satisfactorily met, or shall be met with the conditions of approval, and no significant adverse impacts have been identified. Staff concludes that the request will not be significantly detrimental to the health, safety, or general welfare of the residents or land within the neighborhood or the City and hereby grants preliminary site plan approval with conditions as noted..." The RNA vehemently refutes this statement, and based on the demographic data included in this report, it is clear that the building of this apartment complex will only increase the significant burden already being carried by the low-income and racial minority populations of west Vancouver. A study of the negative impact that apartment complexes have on the Rosemere Neighborhood is included in the next section of this document.

### **The Staff Report and Decision to Permit the Winkleman Apartment Complex**

#### **Section I-B of the Winkleman Staff Report – Background, Land Use and History**

Prior to December 1981, this site was zoned r-4, Multi-Family Residential. Due to inadequate water supply, inadequate sewer availability and substandard streets (no curbs or sidewalks) this site was temporarily re-zoned R1-5, Low Density Residential in December 1981. This "transition area," authorized by the Vancouver Municipal Code, chapter 20.95 allowed development at a lower density than contemplated by the Comprehensive Plan, in order to restrict development until certain improvements could be made.



In March of 1998, M-272 was adopted eliminating the “transition areas” established in 1981. The transition area located from Interstate 5 to St. Johns Blvd., and from Fourth Plain Blvd. north to the City Limits, within the Rosemere Neighborhood, was rezoned back to high density residential and neighborhood commercial. This particular parcel was changed from R1-5 to R-4. Today, the site is zoned R-30, which is equivalent to the R-4 designation of 1988.

### **Rebuttal of Section I-B of the Winkleman Staff Report -- Background, Land Use and History**

The history of the Winkleman parcel is not presented accurately by the city Development Review Services. This section will show a more complete picture of the history, especially how zoning changes have adversely, and disproportionately affected the Rosemere neighborhood.

Rosemere is one of the oldest neighborhoods in Vancouver, and it has a history that is tied to Officer's Row at Fort Vancouver. According to a Chicago Title Insurance Search, 607 of the homes in Rosemere are 75 years old or older, many of the homes having been built just after the turn of the 20<sup>th</sup> century. Rosemere was home to the support staff of the Fort, and several of the buildings were actually picked up and moved from the Fort to the Rosemere Neighborhood where they now serve as homes. During World War II, the neighborhood was rapidly developed to serve as quarters for the thousands of Kaiser Shipyard Workers as well as workers for many other industrial facilities. Historically, the neighborhood has repeatedly been affected by a heavy transient population that comes and goes depending on the availability of work.

The concern over the substandard elements of design within the Rosemere Neighborhood goes back 36 years to a Neighborhood Analysis conducted by the City of Vancouver in August of 1967. Rosemere was known as the Washington Neighborhood back then. This report was studied by the City Council and the Planning Commission of that time. This field analysis was a report completed by Dr. Mihail W. Dumbeliuk-Czernowicky of Eleusis Research, and the report was accomplished by the City Planning Department. Following will be a number of statements quoted from the actual report – these statements correlate with the present day conditions within the Rosemere Neighborhood. The original headings of the sections within the report are included, and statements of note that lend emphasis to present day issues are highlighted in bold.

The purpose of including this old report is to show that City Council was well aware of the issues that would trouble Rosemere and other neighborhoods, and City Council was also warned that greater perils would befall the neighborhood if the city did not take action. In 1967, Rosemere was not a racial minority neighborhood, but the city was warned that inaction could very easily create a ghetto. Presently, Rosemere, and six other neighborhoods in the TOD do qualify as racial minority neighborhoods. Rosemere does suffer from urban blight, and this disease is indeed brought on by the Comprehensive Plan and the zoning methodologies that are governed by the plan.

The residents of Rosemere, some of them still living here since the time this report was created, are frustrated with the lack of city service and the deterioration of the neighborhood. Code enforcement is still dealing with substandard construction issues and buildings that are in disrepair. The majority of the residents here are renters with a transient nature, and the neighborhood has the feel of a social service agency with a bounty of transitional housing facilities being established in the TOD bringing even more people in crisis to an already burdened area. With the rise of social service facilities in Rosemere, the crime rate in the neighborhood increased 30% in only six months from 2001 to the first half of 2002. At the neighborhood Elementary School, 96.3% of the children were receiving free or reduced lunches due to poverty levels. The safety and livability of the neighborhood is still a very large question, and above all, many who fight for this neighborhood feel that their voices are not being heard.

### Taken from the Neighborhood Analysis Report of 1967

#### 1) Study Area Number 5: Washington

“This area, which is also referred to as **Rosemere**, is an area of older homes, many of them minute. **It is an area in which it has been estimated that some forty percent of the inhabitants are renters, eaking out Social Security**



**pensions, welfare checks and similar eleemosynary sources of income.** The housing is not uniformly substandard; indeed the southwest portion of the study area is almost agreeable, and throughout the area, cheek-by-jowl with irredeemable hovels, new structures are to be found, some of which are up to middle class tract standards. Two or three of the older houses are large, and, in face of everything, have been kept with care and an evident affection which is rare in this study area."

## 2) Population Characteristics

"The respondent's comments on horizontal and vertical mobility and migration were interesting. **Of vertical mobility there appear to be none; of horizontal mobility there are those who move fruitlessly around the area in search of a better rental.** Out-migrations are usually the consequence of mass hiring by Boeing, and the in-migrations occur when the gold rush has subsided and the voyagers return to home base. **The indications of cyclical good times and bad times are clear. No wonder then that this is an area in which many, feeling themselves to hold second class passports, are insecure, angry and alienated.**"

## 3) Community Facilities

"The appended maps indicate the houses, which, in this observer's opinion, fall within the **"redevelopment"** category, but these are the more obvious cases and there are at least twice as many which are borderline cases."

## 4) Non-Residential Structures

"St. John's Blvd. is a commercial strip zone, but hardly a dynamic one. **Perhaps the most extreme cases of commercial blight are to be found at the south end...**the only other prosperous non-residential structures are the churches, which is customary in such neighborhoods..."

## 5) Transportation

"The Vancouver bus service runs buses through this area, but not on Sunday, which is a vexation to the churchgoers. Indeed, the car barn of the bus system, an undistinguished structure, is located in this area. One speculates whether the limpness of the service rendered is mirrored in the condition of the bus system's premises or whether, conditioned by the accommodations, the service is bereft of enthusiasm."

## 6) Blight

"**This area is prime renewal for an Urban Renewal program. This is not an area in which patching and the application of band-aids will continue to suffice and, as in Hough, there is much work to be done to arrest the decline of the neighborhood.**"

## 7) Comments

"Apathy in urban life is not peculiar to Vancouver but apathy laced with incertitude and the search for a community role is more disquieting."

## 8) Conclusions

1. **"The Uniform Building Code is intended for new structures, but as is to be expected, the structures relative to blight or potential blight are old and irrelevant to the intention of the code.** This is of special concern in the cases of nursing homes and older dwelling units which abut the Hough and Washington neighborhoods."
2. **"In an attractive area the lack of sidewalks, curbs and even paved roadway is not too disastrous, but when these omissions are found in an area where yards are neglected and houses dilapidated they add to the sense of neglect by the city and of potential if not actual blight. Examples of this are not hard to find, particularly in Hough, Fruit Valley and Washington."**
3. **"Inappropriate land use is another problem in and for the City of Vancouver.** An illustration of such usage is the Home Addition south of River Road in the Fruit Valley neighborhood. **Here a sub-**



**neighborhood of ancient dwelling units, many of them inadequately constructed and the majority in decay, are juxtaposed with an area devoted to heavy industry."**

4. "Public transportation, especially for the senior citizens on reduced incomes, is a real problem. On Sundays there are no buses at all. These persons, then, are forced to buy a car even when this is inconsistent with the capacity of their budgets. In consequence, **fewer and fewer people ride the buses, and the bus company, deprived of its revenue, further curtails its services.** Clearly, the special needs of the elderly and the low income groups are not currently being met."
5. "On the plus side, **there is the extremely interesting fact that the "non-white" persons residing within the City of Vancouver have not sought mutual aid by the establishment of a ghetto, but have dispersed throughout the city. This is extremely important for the preservation for the well-being of the community can be likened to an insurance policy against the misfortunes and chaos which come of inner immigration and ghettos.**"
6. "In a non-randomized sampling of citizen opinion on social problems, the writer received comments on the problems of the aged, of whom there are an atypically high percentage in three of the neighborhoods (but surprisingly not including Fruit Valley), on juvenile delinquency, on unemployment and on the married families of the area. **The majority of the respondents stressed the need for "Action now!" and asked how they could effectively promote their concern and their ideas for problem solving. This willingness to become involved, this desire to participate in a program for the upgrading of the city is an encouraging factor and one which should not be permitted to remain untapped, not only to maintain morale, but also to achieve through collective wisdom and experience the best possible program for the city.**"
7. "As is frequently the case, there is a disproportionately lower percentage of parks in the older, more densely populated portions of the city. Parks are especially needed for the children of low income families who, lacking the money, are less likely to spend vacations out of town."

Thirty-six years later, Rosemere is still underserved by the Urban Comprehensive Plan in regard to parks. There are two small parks in Rosemere: Leach Park (0.25 acres), and Washington School (2.0 acres). The RNA received a CDBG grant just this past year to renovate Leach Park, a park that has substandard and unsafe playground equipment and accessibility issues. With these two parks, Rosemere has a standard of only .045 acres per 1000 residents. The Urban Parks acquisition standard is 6 acres per 1000 residents. If Leverich park (14.25 acres), which borders the Rosemere Neighborhood, is added to these figures, the standard is raised to 3.3 acres per 1000 residents, but this is still not enough to reach the Urban Standard. The city's park district counts Rosemere as a member of Park District #1, the largest park district in the city, stretching across the most western part of the city. Park District #1 shows 223.8 acres or 7.7 acres per 1000 residents, which surpasses the Urban standard. However, as detailed in the analysis from 1967, it is highly unlikely that Rosemere residents would travel to parks outside the neighborhood. Rosemere, therefore, is underserved by the Comprehensive Plan in regard to parklands, and this fact is misrepresented in comparisons with other parklands in the district. Older established neighborhoods require more park space.

The study from 1967 touched on the issues of urban blight, decay, and poor upkeep of properties. Once a neighborhood degenerates, the telltale signs are yards that are unkempt and all manner of refuse strewn about the streets. For years, neighborhood leaders have struggled to put a stop to the tendency for people to use Rosemere as a common dumping ground. Rosemere made the news in the mid 1990's due to the incredible number of junked or stolen vehicles that were abandoned near the northern border of the neighborhood. The RNA still receives complaints from residents regarding large household items that have been dumped in the same area by the side of the road—mattresses, large household appliances, tires, chemicals, and loose bags of garbage. When code enforcement is notified about this recurring problem, the RNA is told that there is nothing that can be done to curtail the illegal dumping. Furthermore, there are a great many houses in the residents in the neighborhood that do not abide by code standards, and yards are filled with junk items, including furniture and auto parts, while grasses and hedges block the common right of way and infringe upon sight lines for intersections. With budgetary



restraints, code enforcement has indicated that as a department, it will no longer be able to keep up with the enforcement needs, and will have to sort and prioritize in order to respond to only the more serious complaints.

In regard to redevelopment, an noteworthy issue arises when dealing with the renovation of buildings that may contain asbestos and lead. Many of the buildings that were erected in the 1970's contain asbestos in the ceiling tiles, floor tiles, and plumbing insulation, and lead may be in the paint or the plumbing for buildings built in the 1940's. As indicated by the Chicago Title company report, there are hundreds of such structures in the Rosemere Neighborhood. Despite this fact, renovation permits do not require the local authorities on asbestos or lead abatement to conduct an on-site inspection to determine the need for certified abatement procedures for these toxic substances. The city's Development Review Services does not make it a common practice to inform the SW Washington Health District or the Air Quality Control agency when applications are received for renovations of suspect buildings. The only way the authorities are aware of the potential for concern is if and when someone gives the agencies a "tip." Furthermore, there is no requirement for the local authorities to publicize a warning when toxic substances are present, or even when abatement procedures are underway.

### **The rezoning of the Winkleman Parcel**

In March of 1988, the City Council approved Ordinance number M-2752, to amend the zoning of Rosemere, Shumway, Lewis, McLoughlin, and Harney Heights neighborhoods. This ordinance removed the "transitional" low-density area and replaced it with higher density zoning. This section of Rosemere, where the Winkleman property now exists, was rezoned for mixed use, or high urban density. Following are statements from the actual ordinance as it was adopted:

"WHEREAS, Ch. 20.95 provided that such transition areas would be rezoned to conform to the Comprehensive Plan therefor only after certain described public improvements had been accomplished or certain other problems mitigated, and..."

"WHEREAS, Staff and Planning Commission after public hearings now recommend (SR 87A88) that each such area be rezoned so that its zoning conforms with the Comprehensive Plan, and that public improvements should be programmed through the capital improvement budgeting process..."

The public improvements that were to be made prior to this change of zoning were to be the installation of sidewalks and curbs, sewer service, water supply and drainage. To date, there are still no sidewalks and curbs on 'O' street, as is the case on many streets throughout Rosemere, and sewer and drainage systems still need to be addressed throughout the neighborhood. Therefore, it is clear that the zoning was changed without the prerequisite completed improvements to the area, and as a result, Rosemere is at risk for urban blight due to the Comprehensive Plan. This is a terrible mistake on the part of the City Council, and it needs to be corrected. This point alone should cause the building permit for the Winkleman complex to be revoked.

### **Verbiage Taken from the Winkleman Staff Report, and the RNA's Rebuttal to Each Item in the Report**

#### **Section II-A of the Winkleman Staff Report – Applicable Regulations, Comprehensive Plan**

"This designation (Urban High Density) provides for the highest density housing in the urban area with a minimum of 23 units per gross acre. Bonus options will allow density increases. Minimum densities assure that areas build out to the density planned, guaranteeing that the Vancouver Urban Area accommodates anticipated residential needs. Areas with this designation shall be located in transit corridors and near commercial and employment centers to provide demand for commercial and transit services while providing easy access to employment...Staff has reviewed the application; the proposal meets the intent of the Comprehensive Plan."

#### **Rebuttal of Section II-A of the Winkleman Staff Report – Applicable Regulations, Comprehensive Plan**

The TOD only exists in the low income and minority neighborhoods in the city. There are other major arterials that run through wealthier neighborhoods, but they do not have high-density zoning as the TOD neighborhoods do.



The Comprehensive Plan does not mitigate adverse affects of high-density development on low income or racial minority neighborhoods.

### **Section II-B of the Winkleman Staff Report – Title 11 Streets and Sidewalks**

“Due to increased vehicular and pedestrian traffic generated from this site and per VMC 11.90.020, 11.80.047, street frontage improvements along ‘O’ Street will be required. Improvements shall include: asphalt roadway, curb and gutter, planter strip, sidewalk, driveway approaches, American with Disabilities Act (ADA) ramps and street lights...The applicant requested a road modification to the minimum spacing of a driveway to an arterial street intersection. This request was based upon the drive location being shared with the property to the south...This development is utilizing the Transit Overlay District provisions of the zoning code to reduce parking requirements. By utilizing this provision, it is anticipated that this development will have a higher-than-normal dependency on transit. The nearest transit route is on Fourth Plain Blvd., approximately 100 feet south of the development. There are no existing sidewalks or pedestrian paths to and from Fourth Plain. The existing pavement is approximately 22 feet wide, which does not provide room for two-way vehicle traffic and pedestrians. Due to the increased pedestrian traffic generated from this site to and from Fourth Plain, an adequate and safe pedestrian path should be provided.”

### **Rebuttal of Section II-B of the Winkleman Staff Report – Title 11 Streets and Sidewalks**

None of the required improvements for this complex exist anywhere else on ‘O’ street, in spite of the intention behind the previous “transitional area” zoning for this part of the TOD. Instead, the city has opted to entice future developers to install these improvements in a piecemeal fashion, rather than providing a complete disbursement of required improvements. The requested road modification was granted to the applicant by the city of Vancouver – typically, the required setback for a driveway from an arterial intersection is 115 feet for safety reasons. The city allowed for this complex to build the driveway only 100 feet from the intersection, forgiving the additional 15 feet.

Directly across the street from the proposed complex is Protective Security (PRJ2001-00529/PAC2001-00059), a grandfathered office building that has been in violation of various city codes for a number of years. Since city does not enforce code compliance for grandfathered buildings, Protective Security is not required to make the same improvements for curb, gutter, sidewalks, etc. The Planning Commission is aware of the conflict, but states nothing can be done. Interstate Security has no accountability to improve the safety of the street, despite the fact that pedestrian and auto traffic will be increasing at the intersection. Furthermore, on the south side of Fourth Plain Blvd., directly across from the ‘O’ street intersection, the Southwest Washington Health District will be constructing a new health care clinic, which will also add to the pedestrian and auto traffic at this location.

Title 11 requires all sidewalks to be ADA complaint. Only those complexes that are above 10 units are required to be ADA compliant – the Winkleman complex, though permitted to be up to 12 units, is only being proposed for 10 units. Thus ADA compliance is not required in the building, despite the fact that it will be two stories in height. It will be unlikely that the elderly or the handicapped will be in residence at the proposed complex. Enforcing ADA compliance for an incomplete section of sidewalk in front of a non-compliant complex does not make sense.

The intersection at Fourth Plain Blvd. and ‘O’ street is a dangerous blind corner due to the lack of improvements. Traffic off of Fourth Plain Blvd. often uses ‘O’ street as a cut-through to other parts of the neighborhood since it is the closest access to Interstate 5. This intersection needs to be redesigned to accommodate traffic safety, especially in light of the fact that a vast increase of cars will be parking on this street if the complex is permitted.

### **Section II-B of the Winkleman Staff Report – Title 11 Streets and Sidewalks, Section 1b, Concurrency**

“The applicant has submitted a traffic analysis dated July 12, 2002, which includes trip generation, trip distribution and safety analysis for impacted intersections. As required, a traffic study to evaluate the impact of the proposed development onto the City’s intersections and the City’s concurrency corridors was submitted...The traffic study completed analysis of Fourth Plain Blvd. and ‘O’ Street and the site access. The analysis indicates that the trips



from the proposed development onto the impacted intersection will meet the City Standards set by VMC 11.90 as indicated in Tables 5 and 6 of the study.”

### **Rebuttal of Section II-B of the Winkleman Staff Report – Title 11 Streets and Sidewalks, Section 1b, Concurrency**

The Rosemere Neighborhood Association conducted its own traffic survey for the impacted intersection at Fourth Plain Blvd. and ‘O’ street. The results are listed in the chart below.

#### **Chart #7**

#### **Traffic Study of ‘O’ Street Intersection performed by RNA**

Data collected Wednesday, January 22, 2002

| <b>Time of Day</b> | <b>From 'O' Street<br/>Westbound<br/>onto Fourth<br/>Plain Blvd</b> | <b>From 'O' Street<br/>Eastbound<br/>onto Fourth<br/>Plain Blvd</b> | <b>From Fourth<br/>Plain Blvd<br/>Westbound<br/>onto 'O' Street</b> | <b>From Fourth<br/>Plain Blvd<br/>Eastbound<br/>onto 'O' Street</b> | <b>Totals</b> |
|--------------------|---|---|---|---|---------------|
| 6:00-6:30am        | 8   | 2   | 4   | 1   | 15            |
| 6:30-7:00am        | 16  | 6   | 5   | 1   | 28            |
| 7:00-7:30am        | 18  | 13  | 8   | 6   | 45            |
| 7:30-8:00am        | 9   | 7   | 5   | 5   | 26            |
| 8:00-8:30am        | 8   | 8   | 4   | 3   | 23            |
| 8:30-9:00am        | 12  | 6   | 6   | 3   | 27            |
|                    |   |   |   |   |               |
| 4:00-4:30pm        | 13  | 4   | 16  | 36  | 69            |
| 4:30-5:00pm        | 9   | 4   | 15  | 32  | 60            |
| 5:00-5:30pm        | 14  | 7   | 19  | 24  | 64            |
| 5:30-6:00pm        | 8   | 6   | 11  | 26  | 51            |
| 6:00-6:30pm        | 13  | 3   | 17  | 15  | 48            |
| 6:30-7:00pm        | 11  | 10  | 14  | 12  | 47            |
| <b>TOTALS</b>      | <b>139</b>  | <b>76</b>   | <b>124</b>  | <b>164</b>  | <b>503</b>    |

#### **Traffic Study Performed by H. Lee and Associates**

| <b>PM Peak Traffic<br/>on Various Days</b> | <b>From 'O' Street<br/>Westbound<br/>onto Fourth<br/>Plain Blvd</b> | <b>From 'O' Street<br/>Eastbound<br/>onto Fourth<br/>Plain Blvd</b> | <b>From Fourth<br/>Plain Blvd<br/>Westbound<br/>onto 'O' Street</b> | <b>From Fourth<br/>Plain Blvd<br/>Eastbound<br/>onto 'O' Street</b> | <b>Totals</b> |
|--|---|---|---|---|---------------|
| Figure 4                                   | 27  | 14  | 32  | 40  | 113           |
| Figure 5                                   | 28  | 15  | 33  | 42  | 118           |
| Figure 7                                   | 29  | 16  | 35  | 44  | 124           |
| Figure 8                                   | 34  | 18  | 40  | 51  | 143           |
| Figure 9                                   | 35  | 19  | 42  | 53  | 149           |
| <b>TOTALS</b>                              | <b>153</b>  | <b>82</b>   | <b>182</b>  | <b>230</b>  | <b>647</b>    |



### **Synopsis of Chart #7**

- The traffic study performed by H. Lee and Associates shows the PM peak hour traffic volumes to be less than those recorded by the RNA for those trips accessing 'O' street from Fourth Plain Blvd heading eastbound. RNA figures are approximately 23% higher. This figure shows that the city analysis does not accurately represent cut-through traffic at this intersection.
- The H. Lee and Associates study does not account for the building of the Southwest Washington Health District clinic directly across Fourth Plain Blvd. from this intersection.

### **Additional Traffic Control Concerns**

There is only one stop light within the boundaries of the Rosemere Neighborhood at the intersection of St. John's Blvd. and E. 33<sup>rd</sup> street. The remaining 5 stoplights are all on the borders of the neighborhood, all along the two cross-town thoroughfares, Fourth Plain Blvd. and State Route 500. St. John's Blvd. is an arterial street which connects State Route 500 with Fourth Plain Blvd. The traffic on St. John's Blvd. is very high for an arterial that run right through the middle of a residential neighborhood. Much of the traffic is due to the presence of Clark College just beyond the Rosemere Neighborhood, as well as commuter traffic feeding back and forth from Downtown to the Minnehaha area. For more than two years, the RNA has stated the neighborhood's concerns for a much needed stop light at the intersection of St. John's Blvd. and Fort Vancouver Way. This intersection has been studied by traffic engineers, and it meets the required traffic volumes to warrant a controlled signal. At present, the intersection fails to comply with service standards for traffic that needs to turn against the flow of oncoming traffic. Residents have stated repeatedly that this intersection is dangerous and that someone is going to get killed there. The intersection is in need of traffic control devices, and it has been placed on the city's six-year plan, but there is no guarantee that the intersection will ever be funded for a traffic light. This intersection connects with the only other signaled intersection in the neighborhood, and sits on the connecting path between two of the most heavily traveled arterials in the city, yet it remains to be a substandard intersection. This type of problem is typical of the traffic dangers that plague the higher density neighborhoods in the TOD. In fact, a city traffic engineer stated that this kind of intersection would never again be built within the city due to its poor design.

### **Section II-2c of the Winkleman Staff Report – Storm Sewer**

"The project site is currently vacant. There is an existing catch basin in the shoulder of 'O' street on the east frontage of the project as well as one on the east side of the street. It is unclear as to where the catch basins drain to."

### **Rebuttal to Section II-2c of the Winkleman Staff Report – Storm Sewer**

Drainage has long been an issue throughout the neighborhood since the storm sewer system is incomplete. Standing water is commonplace. There has been insufficient study to determine if run-off from poor drainage has been polluting the water table through Burnt Bridge Creek which abuts Rosemere's northern border.

### **Section II-3 of the Winkleman Staff Report – Fire Apparatus Access**

"Fire department apparatus access is acceptable as submitted on the plan."

### **Rebuttal to Section II-3 of the Winkleman Staff Report – Fire Apparatus Access**

With street parking on both sides of this narrow street, fire department access may be restricted, which could cause conflicts with oncoming traffic from Fourth Plain Blvd. turning onto 'O' street via access of a blind intersection.

### **Section II-5b of the Winkleman Staff Report – Zoning, District Uses**

"The proposal for a 10 unit multi family complex complies with the district in which it is proposed."

### **Rebuttal to Section II-5b of the Winkleman Staff Report – Zoning, District Uses**



The current zoning did not achieve the prerequisite improvements to sidewalk, curb and gutter as mitigated by the “transitional area” rezoning for minimal density from 1981. Furthermore, the RNA maintains that the incentives to develop within residential areas that are zoned R-30 are unfair in that it allows for multiple unit complexes to be built in and among pre-existing single family units.

#### **Section II-5c of the Winkleman Staff Report – Parking and Loading**

“Parking is required to be provided for multi-family dwellings at a ratio of 1.5 spaces per unit. For 10 units, 15 spaces would be the minimum allowed. This site is located within the boundaries of the Transit Overlay District, which allows a 25% reduction in the minimum parking requirements...The minimum parking required is 11 spaces.

#### **Rebuttal to Section II-5c of the Winkleman Staff Report – Parking and Loading**

Aside from the ADA requirements, the other reason why the complex is proposed as only 10 units instead of 12 units is because of the parking requirements. Parking is a large issue with this proposed complex. The developer could only find room for 11 parking stalls in the design of the building (1.5 parking stalls are required for each unit in the complex). At 12 units, the developer would have had to provide 13 to 14 parking stalls, and the design would have to be altered dramatically. There simply isn’t enough room in the plot of land to provide for that much parking without building up, which would increase the building costs substantially. Furthermore, the city allows for 5 of the required parking stalls to be located curbside in front of the property. This sort of private parking allowance is not available to any other kind of residence. There is no allocation for visitor’s parking. All overflow parking will end up crowding the intersection on both sides of the street, as well as in the yards of adjacent property owners since there is no curb or sidewalk.

The allowed 25% reduction in required parking stalls, per the TOD zoning, does not provide for any form of code enforcement should any of the complex’s residents seek to park more than one car per unit. The TOD “assumes” that the residents of the complex will have a higher than normal dependency on mass transit, yet there is no way to make sure that residents are using this service. Again, all overflow will end up on adjacent properties. This is by far one of the most problematic elements of the complex’s design – neighbors have voiced their opposition to the parking requirements, and their letters are submitted to the Planning Commission for review.

#### **Section II-5d of the Winkleman Staff Report – Landscape and Open Storage**

“Open storage is allowed provided it is screened by a six foot sight obscuring fence or hedge. The plans indicate the garbage and recycle area will be enclosed with a six foot gate...It is recommended that the garbage/recycle area be moved away from the west fence which borders the cemetery to avoid unauthorized access over the fence to the cemetery.”

#### **Rebuttal to Section II-5d of the Winkleman Staff Report – Landscape and Open Storage**

According to the city’s waste management services, the 6 foot by 10 foot garbage and recycling enclosure shown on the revised plans is large enough to accommodate a 4 foot by 7 foot garbage dumpster, but not the three 3 foot by 3 foot recycling roll carts.

Access for the garbage truck is down a 110-foot driveway with the dumpster area at the rear of the property. A Waste Management operations staff supervisor who visited the site thought that the truck would go in forward, then back out to the north. His main concern was on-street parking across the street; it would make more difficult to back out if there are cars parked across the street from the apartment driveway. A few years ago, a Waste Management truck ran over and crushed a seven year-old girl to death. There is a tremendously dangerous safety issue with a garbage truck backing in or out of a 110-foot driveway where children will be at play. Furthermore, the placement of the garbage dumpster at the rear end of the building would be another cause for safety concern. The dumpster area would be hidden from view, tucked into a corner behind a parking stall, all surrounded by screening. This would be a prime location for a rape to occur, especially since there are known level II and level III sex offenders living in the surrounding vicinity. The garbage area should be relocated as a matter of public



safety, and Development Review recommends that the dumpster area be moved in order to prevent unauthorized access over the back fence to the adjacent cemetery.

### **Section II-6 of the Winkleman Staff Report – Title 21 State Environmental Policy Act**

“This project has been determined to be categorically exempt.”

### **Rebuttal to Section II-6 of the Winkleman Staff Report – Title 21 State Environmental Policy Act**

All apartment complexes with less than 20 units are exempt from SEPA regulations. Without applying to the national level, or NEPA through a Title VI complaint, the negative impacts on the low-income and racial minority populations would not be identified.

### **Section III of the Winkleman Staff Report – Decision**

“The proposed development is permitted outright. Based upon the findings and conclusions herein, the criteria for approval have been satisfactorily met, or shall be met with the conditions of approval, and no significant adverse impacts have been identified. Staff concludes that the request will not be significantly detrimental to the health, safety, or general welfare of the residents or land within the neighborhood or the City and hereby grants preliminary site plan approval with conditions...”

### **Rebuttal to Section III of the Winkleman Staff Report – Decision**

The Rosemere Neighborhood Association has successfully identified a number of factors that point to significant adverse impacts to the neighborhood with the permit of this apartment complex, and the association hereby objects to the staff decision and requests a Federal investigation into this Title VI and Environmental Justice Complaint. The “conditions” herein mentioned do not mitigate adverse impacts to low-income or racial minority populations, and therefore, the permit of this building is cause for the city’s engagement in racial discrimination in its exercise of power to protect neighborhoods from adverse environmental effects. The RNA alleges and offers proof of evidence that the city departed from its normal substantive standards requiring it to protect and improve each neighborhood of the city so as to be a desirable and attractive neighborhood. The city departed from the substantive standards in its zoning ordinances requiring the protection of residential neighborhoods from the adverse effects of industrial contamination. The city also failed to apply to Rosemere its own policy requiring the application of a comprehensive strategy of housing improvement and neighborhood development to achieve neighborhood stability, as it has done in other neighborhoods throughout the city.

### **A Study of How Apartment Complexes in the Rosemere Neighborhood Use Emergency Services**

While studying the overall effects the proposed 'O' St apartment complex would have on Rosemere, the RNA gathered information from Vancouver Fire Department, Emergency Medical Services, & Vancouver Police Department. The RNA identified 18 apartment complexes in Rosemere, and studied incident responses from each department to each of the complexes in order to identify the level of service used over the course of one year. Using the tallies, the RNA then asked each department to figure an average cost per incident -- this is something that has never been done before in the city's cost accounting. The result of the study shows that the city’s management of emergency services as a result of high urban density development does not achieve the “proper balance in use from cost-revenue point of view” as mandated by the Urban Comprehensive Plan.

Jan Bader, assistant to the City Manager, wrote "Your question about what it costs to dispatch police on a call apparently triggered some thinking by our Police Department and Performance Analyst." The Vancouver Police Department roughly estimates an average cost for a police call is "\$213, based on 2001 staffing & call volume for 'simple' calls without investigators, special teams or significant time on the case." And "calls with multiple units or special operations are not included in this average cost."

According to Vancouver Police Department crime analysis figures for 2001, the frequency of incidents of crime is 53% higher in Rosemere than the average in all Clark County Neighborhoods. There are many neighborhoods that



have a higher crime rate than Rosemere. These crime statistics reflect the following crimes among others: assault, burglary, domestic violence, rape, drugs, forgery, harassment, & malicious mischief. The incidents of crime statistics for Rosemere (taken from the Vancouver Police website) show 1103 incidents of crime in 2001 over all. CRESA, the regional 911 center, documents 644 dispatches of police during the course of one year to these same 18 apartment complexes listed. Comparing these figures, this indicates that 58% of the crime incidents that occurred in Rosemere over the past year may be linked to the 18 apartment complexes studied.

Dennis Walker, Deputy Fire Chief, figured cost estimates of Fire & EMS dispatch by applying averages from [VPD] payroll, vehicle rates from the Washington Association of Fire Chiefs published rate schedule, and on-scene-time averages from [VPD]business-plan research. A typical EMS call involves one engine company, including a captain, firefighter paramedic, & firefighter for 1 hour, or \$195. A typical fire call involves three engine companies, one truck company, & one battalion chief for 1 hour, or \$959. Staffing, then, would be one battalion chief, four captains, four paramedics, & five firefighters. The average time of one hour includes response, on-scene, return, equipment maintenance, & report writing. Surprisingly, the average for fires is within two minutes of that for EMS."

There are 19 active section-8 apartment units currently within the 18 apartment complexes included in this study. David Overbay of the Vancouver Housing Authority writes, "The average subsidy paid for a [section 8] voucher holder was \$448 in December. There is a 'cap' of a sort on each bedroom size an individual or family qualifies for. The VHA sets a payment standard for each bedroom size; the subsidy is the payment standard minus 30% of the family's monthly income." Inhabitants of section-8 housing have been known to participate in drug-related & other illegal activities.

#### **CITY EMERGENCY SERVICES TO APARTMENTS IN ROSEMERE OVER ONE YEAR 2001-2002**

| <b>Address</b>  | <b>Fire</b>    | <b>EMS</b>      | <b>Police</b>    | <b>Section 8</b> |
|---|----------------|-----------------|------------------|------------------|
| 1712 E 4th Plain  |                | 6               | 36               |                  |
| 1806 E 4th Plain  | 1              | 3               | 54               | 1                |
| 1818 E 4th Plain  | 2              | 4               | 36               |                  |
| 2008 E 4th Plain  | 1              | 2               | 24               |                  |
| 2010 E 4th Plain  | 1              | 2               | 58               | 2                |
| 2209 E 30 <sup>th</sup>   | 1              |                 | 28               |                  |
| 2214 E 30 <sup>th</sup>   | 1              | 4               | 46               | 1                |
| 2600 T St.  | 5              | 20              | 68               | 8                |
| 2610 R St.  | 2              | 7               | 52               | 2                |
| 2615 O St.  |                | 3               | 32               |                  |
| 3415 R St.  |                | 2               | 27               | 3                |
| 2611-2627 E 27 <sup>th</sup>  |                |                 | 10               |                  |
| 2211 E 30 <sup>th</sup>   |                |                 | 15               |                  |
| 2605 T St.  |                |                 | 8                | 1                |
| 1110-1112 E 37 <sup>th</sup>  |                |                 | 5                |                  |
| 3005 St. Johns  |                | 3               | 50               |                  |
| 2008 St. Johns  |                | 2               | 59               |                  |
| 1512 E 4th Plain  |                |                 | 36               | 1                |
| <b>Total Calls</b>  | <b>7</b>       | <b>58</b>       | <b>644</b>       | <b>19</b>        |
| Rough Estimates for Cost of Calls to Apartments in Rosemere for one year. | <b>\$6,713</b> | <b>\$11,310</b> | <b>\$137,172</b> | <b>\$102,144</b> |



|   |                   |
|---|-------------------|
| Grand Total of Estimated Costs Paid<br>by Taxpayers to these 18 Complexes in<br>one year: | <b>\$257,339*</b> |
|---|-------------------|

\*These cost estimates are tallied by merely one hour per incident, & do not include multiple engines or patrol cars, lengthy calls, investigative costs, or special operations such as Drug Task Force, which will substantially add to the overall taxpayer costs generated by the apartments in this study. The total figure merely represents a baseline estimate; the actual figure would be much higher.

### **Requested Remedies**

In light of the evidence that the Rosemere Neighborhood has been adversely affected by the City's alleged discrimination, the Rosemere Neighborhood Association requests the following steps be taken to help mitigate the negative social and economic impacts caused by the TOD:

- 1) Revoke the permit for the Winkleman Apartment Complex
- 2) Revoke the city's Transit Overlay District (TOD) zoning ordinance in all neighborhoods.
- 3) Remove the R-30, high urban density zoning from residential areas where there are single family homes and replace the R-30 zones with lower densities. Limit R-30 zones to parcels with already existing apartment complexes.
- 4) Prevent further zoning overlays from compromising parking, density and setbacks with building incentives as displayed in the TOD.
- 5) Limit mixed use zoning to prevent businesses from being built in between single family homes.
- 6) Adopt ordinances to keep commercial or business properties up to the level of the current building codes.
- 7) Implement plans for the completion of sidewalks, curbs, gutters, drains and sewers in urban neighborhoods areas that do not have them.
- 8) Undertake an ecological study and check for pollutants in the water table surrounding Burnt Bridge Creek.
- 9) Improve traffic safety and traffic calming devices where needed.
- 10) Audit section 8 residents with mandatory drug testing, and cancel any vouchers for those who test positive for drugs.
- 11) Re-examine the Comprehensive Plan to develop alternative methods of rapid growth management, such as expanding the city limits, in order to prevent discrimination in the future.

### **Sources of Information for this Study**

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Jackson Federal Building  
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# Low Income and People of Color Communities

## Rosemere (Vancouver, WA) Neighborhood

Lat: 45 38 32.5 Long: 122 39 18.6  
CLARK County, WA.

This computer representation has been compiled by the U.S. Environmental Protection Agency (EPA) from sources which have supplied data or information that has not been verified by the EPA. This data is offered here as a general representation only, and is not to be used for commercial purposes without verification by an independent professional qualified to verify such data or information. The EPA does not guarantee the accuracy, completeness, or timeliness of the information shown, and shall not be liable for any loss or injury resulting from reliance upon the information shown.

### LEGEND

Note: Facility labeling turned off for categories with more than 50 points. Some facilities without good addresses may plot at zip code centroids. Facility points have been restricted to user specified area.

- CERCLIS NPL Site
- CERCLIS NPL Site (Proposed)
- CERCLIS Deleted From NPL Final Site
- CERCLIS Part of NPL Final Site
- CERCLIS Non-NPL Site (Many located by zip code)
- Archived from CERCLIS
- + RCRA TSD or LQG Site (Others Excluded)
- + EPCRA TRI Site (Toxics Release Inventory)
- + PCS Facility Site
- + AFS/AIRS Site
- Hospital
- School
- Major Roads and Highways
- Other Roads
- Wetlands / Washington Area (National Wetland Inventory)
- Wetlands / Oregon Area (1979 GIRAS Data Only)
- County Boundary

### EJ Income and Minority Factors (Census 2000)

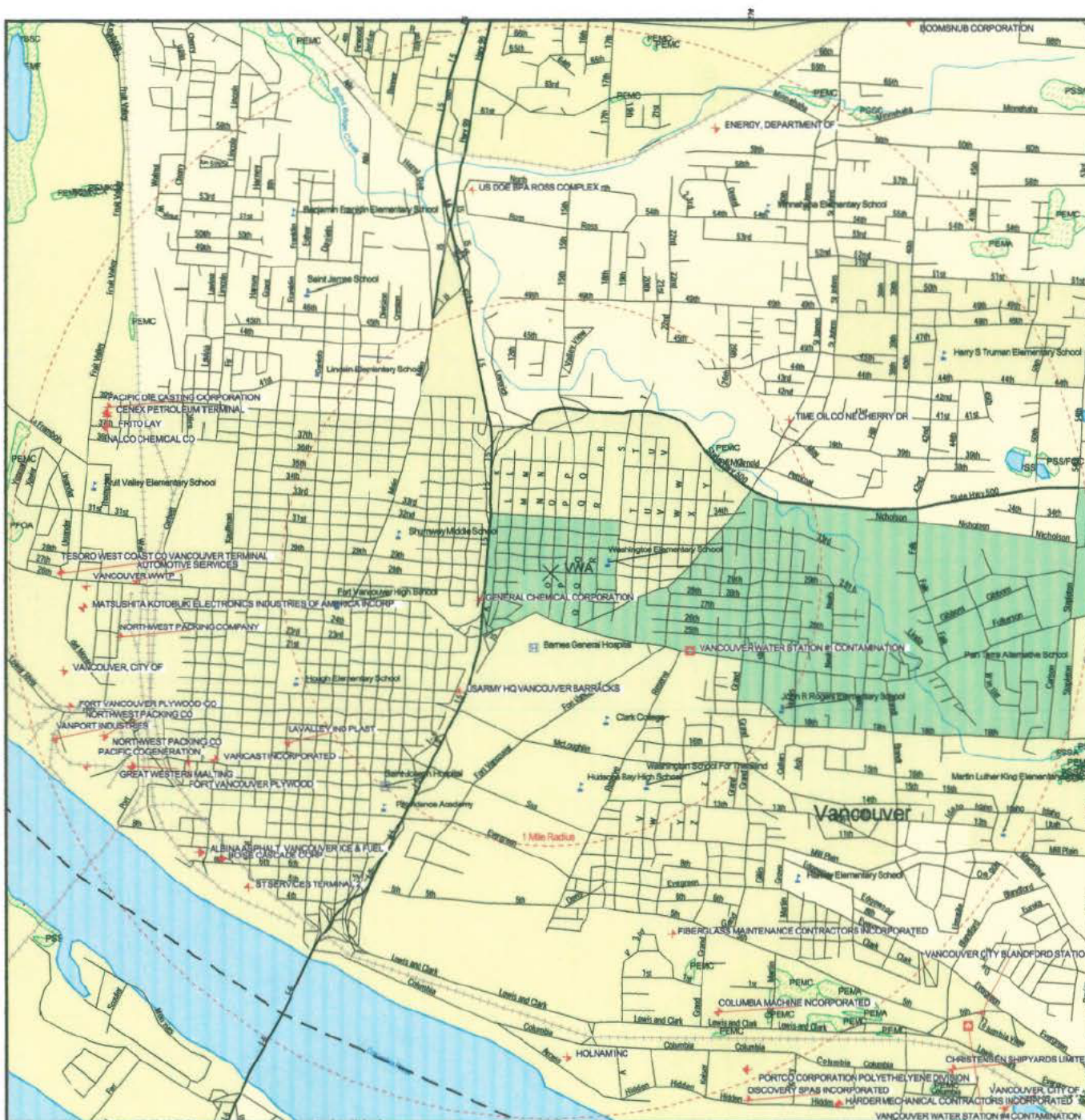
- Block Group below criteria
- Pct HH Income under 25K is greater than State Avg
- Pct Minority is greater than 1.2 x State Avg
- Both Income and Minority factors above criteria



Produced 02/12/03  
By SITEINFO (Req #50342)

Exhibit 2







EPA GEOGRAPHIC INFORMATION QUERY SYSTEM (Version 97.1.8) 02/12/03

=====

Title : Low Income and People of Color Communities  
Sub-Title: Rosemere (Vancouver, WA) Neighborhood

CLARK County, WA.

Location in Lat/Long: 45 38 32.5 122 39 18.6 (DMS)

US Albers: X= -362509 Y= 442933 (Meters)

Map Scale: Auto Fit to 15 x 11

Notes:

Read Notes on accuracy and extent of all GIS database coverages!!!

Note Version Id on top line as we are continuously upgrading data layers, quality, and calculation methods for this report and associated graphics.

Disclaimer:

This computer representation has been compiled by the Environmental Protection Agency (EPA) from sources which have supplied data or information that has not been verified by the EPA. This data is offered here as a general representation only, and is not to be used for commercial purposes without verification by an independent professional qualified to verify such data or information. The EPA does not guarantee the accuracy, completeness, or timeliness of the information shown, and shall not be liable for any loss or injury resulting from reliance upon the information shown.

\*\*\* End of Notes \*\*\*

<ff>

\*\*\*\*\*

\*\* EPA Regulated Site / Management Information \*\*

\*\*\*\*\*

Indian Nation Information

=====

Site apparently not located within 1 mile any Indian Nation areas.

Air Non-Attainment Area Information

=====

Site located in Vancouver Carbon Monoxide non-attainment area.

Site located in Vancouver Ozone non-attainment area.



## EPA Envirofacts Facility Databases Information

=====

Note: 07/22/2002 -- Using National EPA Envirofacts Data Layer

### Important Notes:

1. For information about the various EPA Facility Program databases and their environmental/regulatory aspects, see the Envirofacts WWW home page at <http://www.epa.gov/enviro/>
2. Locational accuracy currently varies greatly for this database as EPA is in the process of improving it. Some facilities may still be located at zip code centroids or even have wrong lat/longs putting a facility in a wrong state!
3. RCRIS facilities that are treatment, storage, or disposal (TSD) and/or large quantity generators (LQG), are flagged with an \* after the RCRIS program code (RCRIS\*). Small quantity and other are flagged with a - (RCRIS-).

### Your Specific Requested Options:

RCRIS Facilities: Selected

You have specified to include ONLY the treatment/storage/disposal (TSD) and large quantity generator (LQG) facilities and not the miscellaneous small quantity and other handler facilities! The small quantity and other RCRA facilities will ONLY be listed if the facility ALSO HAS ANOTHER type requested facility!

PCS (NPDES) Facilities: Selected

AIRS/AFS Facilities: Selected

CERCLA Facilities: Selected

TRI Facilities: Selected

### Text Report Legend:

FacUIN: EPA unique facility identification number.

Pgm: EPA Program Acronym.

Pgm Id: EPA Program database identification #.

LocSrc: Source of Albers projected data used for plotted point location.

Accuracy: Estimated accuracy of locational data in meters for plotted point based on collection method.

### Distance Range From 0 to 1 mile(s):

-----

Envirofacts: 25 total facility record instances within search request...

Of these, we are interested in the following Program Facilities:

21 RCRIS instances (All - "Major" and "Minor")

( 1 of these are "Major" TSD or LQG facilities)

0 PCS instances

0 AFS/AIRS instances

1 CERCLIS instances

2 TRIS instances



FacUIN: 110001133764 Name: GENERAL CHEMICAL CORPORATION  
 Addr: 2611 W. 26TH ST. EXTENSION, VANCOUVER, WA. 98660

| Pgm    | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------------|--------------|------------|--------|----------|
| TRIS   | 98660GNRLC2611W       | Map 45.64050 | -122.66174 |        |          |
|        | Override Pgm 45.64028 | -122.69944   |            |        | 11000m   |
| TRIS   | 98660GNRLCWEST2       | Map 45.64050 | -122.66174 |        | 2000m    |
| RCRIS- | WAD009055211          | Map 45.64050 | -122.66174 |        |          |
|        | Override Pgm 45.64011 | -122.69008   |            |        | ?        |

FacUIN: 110006884069 Name: USARMY HQ VANCOUVER BARRACKS  
 Addr: ?, ?, ?. ?

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| RCRIS* | WA7210020924 | Map 45.63561 | -122.66281 |        | ?        |

FacUIN: 110009317113 Name: VANCOUVER WATER STATION #1 CONTAMINATION  
 Addr: E. RESERVE AND N.E. FOURTH PLAIN BLVD., VANCOUVER, WA. 98663

| Pgm     | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|---------|--------------|--------------|------------|--------|----------|
| CERCLIS | WAD988519708 | Map 45.63847 | -122.64542 |        | 5m       |

Distance Range From 1 to 5 mile(s):  
 -----

Envirofacts: 645 total facility record instances within search request...

Of these, we are interested in the following Program Facilities:

455 RCRIS instances (All - "Major" and "Minor")  
 ( 27 of these are "Major" TSD or LQG facilities)  
 25 PCS instances  
 55 AFS/AIRS instances  
 1 CERCLIS instances  
 55 TRIS instances

FacUIN: 110000487152 Name: COLUMBIA STEEL CASTING COMPANY INCORPORATED  
 Addr: 10425 N BLOSS AV, PORTLAND, OR. 97203

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc | Accuracy      |
|----------|-----------------|--------------|------------|--------|---------------|
| TRIS     | 97203CLMBS10425 | Map 45.59857 | -122.72801 |        | 150m          |
| AFS/AIRS | OR0040645       | Map 45.59857 | -122.72801 |        | 150m          |
| RCRIS-   | ORD009022708    | Map 45.59857 | -122.72801 |        | AIRS/AFS 150m |

FacUIN: 110000487223 Name: RODDA PAINT COMPANY  
 Addr: 6123 N MARINE DR, PORTLAND, OR. 972036443

| Pgm      | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------------|--------------|------------|--------|----------|
| TRIS     | 97203RDDPN6123N       | Map 45.61980 | -122.72428 |        | 150m     |
| AFS/AIRS | OR0941918             | Map 45.61980 | -122.72428 |        |          |
|          | Override Pgm 45.60793 | -122.70927   |            |        | ?        |
| RCRIS*   | ORD009020470          | Map 45.61980 | -122.72428 |        | 150m     |

FacUIN: 110000487474 Name: HENRY COMPANY GILSONITE DIVISION  
 Addr: 2946 N.E. COLUMBIA BLVD., PORTLAND, OR. 972110242

| Pgm      | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------------|--------------|------------|--------|----------|
| TRIS     | 97211GLSNT2946N       | Map 45.57480 | -122.63363 |        |          |
|          | Override Pgm 45.57500 | -122.63333   |            |        | 150m     |
| AFS/AIRS | OR0915972             | Map 45.57480 | -122.63363 |        | 150m     |



FacUIN: 110000487483 Name: NABISCO PORTLAND BAKERY  
 Addr: 100 NE COLUMBIA BLVD, PORTLAND, OR. 972111416

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc   | Accuracy |
|----------|-----------------|--------------|------------|----------|----------|
| TRIS     | 97211NBSCB100NE | Map 45.58191 | -122.66256 |          | 150m     |
| AFS/AIRS | OR0764162       | Map 45.58191 | -122.66256 |          | 150m     |
| RCRIS*   | ORD009048828    | Map 45.58191 | -122.66256 | AIRS/AFS | 150m     |

FacUIN: 110000487526 Name: CHRISTENSON OIL  
 Addr: 3747 N SUTTLE RD, PORTLAND, OR. 972177731

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 97217CHRST3747N | Map 45.61370 | -122.70603 |        | 150m     |

FacUIN: 110000487562 Name: REXAM GRAPHICS INCORPORATED  
 Addr: 12238 N NORTH PORTLAND RD, PORTLAND, OR. 972177711

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc   | Accuracy |
|----------|-----------------|--------------|------------|----------|----------|
| TRIS     | 97217GRPHC12238 | Map 45.61311 | -122.70329 |          | 150m     |
| AFS/AIRS | OR0962504       | Map 45.61311 | -122.70329 | RCRAINFO | 150m     |
| RCRIS*   | ORD987188992    | Map 45.61311 | -122.70329 |          | 150m     |

FacUIN: 110000487571 Name: MACADAM ALUMINUM & BRONZE COMPANY 130130  
 Addr: 1255 N COLUMBIA BLVD, PORTLAND, OR. 972176701

| Pgm      | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------------|--------------|------------|--------|----------|
| TRIS     | 97217MCDML1255N       | Map 45.58413 | -122.67835 |        | 150m     |
| AFS/AIRS | OR0040611             | Map 45.58413 | -122.67835 |        |          |
|          | Override Pgm 45.58415 | -122.67826   |            |        | 1000m    |
| PCS      | ORG250036             | Map 45.58413 | -122.67835 |        |          |
|          | Override Pgm 45.58444 | -121.32167   |            |        | ?        |

FacUIN: 110000487580 Name: PENNZOIL QUAKER STATE COMPANY PORTLAND PACKAGING PLANT  
 Addr: 440 N COLUMBIA BLVD, PORTLAND, OR. 972171008

| Pgm    | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------|--------------|------------|--------|----------|
| TRIS   | 97217PNNZL440NC | Map 45.58357 | -122.66900 |        | 150m     |
| RCRIS- | ORD987174844    | Map 45.58357 | -122.66900 |        | 150m     |

FacUIN: 110000487599 Name: DYNEA OVERLAY INCORPORATED  
 Addr: 2301 N COLUMBIA BLVD, PORTLAND, OR. 972176954

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------|--------------|------------|--------|----------|
| TRIS     | 97217RGNVR2301N | Map 45.58670 | -122.68871 |        | 150m     |
| AFS/AIRS | OR0764180       | Map 45.58670 | -122.68871 |        | 150m     |
| RCRIS-   | ORD009056045    | Map 45.58670 | -122.68871 |        | 150m     |

FacUIN: 110000487624 Name: AVIATION EXTERIORS PORTLAND INCORPORATED  
 Addr: 4635 NE CORNFOT DR, PORTLAND, OR. 972181291

| Pgm      | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------------|--------------|------------|--------|----------|
| TRIS     | 97218VTNXT4635N       | Map 45.57777 | -122.61156 |        |          |
|          | Override Pgm 45.57944 | -122.61361   |            |        | ?        |
| AFS/AIRS | OR0796790             | Map 45.57777 | -122.61156 |        | 150m     |
| RCRIS*   | ORD987196284          | Map 45.57777 | -122.61156 |        |          |
|          | Override Pgm 0.00000  | 0.00000      |            |        | ?        |



FacUIN: 110000490905 Name: ATTBAR INCORPORATED

Addr: 6205 NE 63RD ST, VANCOUVER, WA. 986611908

| Pgm      | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------------|--------------|------------|--------|----------|
| TRIS     | 98642TTBRN1721N       | Map 45.66807 | -122.60704 | -      | -        |
|          | Override Pgm 45.81250 | -122.69167   |            |        | 99999m   |
| TRIS     | 98661TTBRP6205N       | Map 45.66807 | -122.60704 |        | 150m     |
| AFS/AIRS | WA0912925             | Map 45.66807 | -122.60704 |        | 150m     |
| RCRIS-   | WAD988475299          | Map 45.66807 | -122.60704 |        | 150m     |
| RCRIS-   | WAR000000273          | Map 45.66807 | -122.60704 |        | -        |
|          | Override Pgm 45.81113 | -122.71608   |            |        | 6000m    |

FacUIN: 110000490923 Name: MATSUSHITA KOTOBUKI ELECTRONICS INDUSTRIES OF AMERICA INCORP

Addr: 2001 KOTOBUKI WY, VANCOUVER, WA. 986601351

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc   | Accuracy |
|----------|-----------------|--------------|------------|----------|----------|
| TRIS     | 98660MRCKT2001K | Map 45.63892 | -122.69183 |          | 150m     |
| AFS/AIRS | WA0955693       | Map 45.63892 | -122.69183 | RCRAINFO | 150m     |
| RCRIS-   | WAD154018436    | Map 45.63892 | -122.69183 |          | 150m     |

FacUIN: 110000490932 Name: PACIFIC DIE CASTING CORPORATION

Addr: 5712 N.W. FRUIT VALLEY RD., VANCOUVER, WA. 98660

| Pgm    | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------------|--------------|------------|--------|----------|
| TRIS   | 98660PCFCD5712N       | Map 45.64958 | -122.69082 | -      | -        |
|        | Override Pgm 45.58333 | -122.65000   |            |        | ?        |
| RCRIS- | WAD009024720          | Map 45.64958 | -122.69082 |        | 150m     |

FacUIN: 110000490941 Name: VANALCO INCORPORATED

Addr: 5701 N.W. LOWER RIVER RD., VANCOUVER, WA. 986609805

| Pgm      | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------------|--------------|------------|--------|----------|
| TRIS     | 98660VNLCN5701N       | Map 45.64944 | -122.73222 | -      | -        |
|          | Override Pgm 45.66076 | -122.74064   |            |        | 150m     |
| AFS/AIRS | WA0750080             | Map 45.64944 | -122.73222 | -      | -        |
|          | Override Pgm 45.64944 | -122.73444   |            |        | ?        |
| PCS      | WA0000299             | Map 45.64944 | -122.73222 |        | 26m      |
| RCRIS*   | WAD981766751          | Map 45.64944 | -122.73222 | -      | -        |
|          | Override Pgm 45.66076 | -122.74064   |            |        | 150m     |

FacUIN: 110000490950 Name: CHRISTENSEN SHIPYARDS LIMITED

Addr: 4400 SE COLUMBIA WY, VANCOUVER, WA. 986615570

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc   | Accuracy |
|----------|-----------------|--------------|------------|----------|----------|
| TRIS     | 98661CHRST4400C | Map 45.61714 | -122.62349 |          | 150m     |
| AFS/AIRS | WA0959555       | Map 45.61714 | -122.62349 | RCRAINFO | 150m     |
| RCRIS-   | WAD103015756    | Map 45.61714 | -122.62349 |          | 150m     |

FacUIN: 110000490969 Name: COLUMBIA MACHINE INCORPORATED

Addr: 107 GRAND BLVD., VANCOUVER, WA. 986688950

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------|--------------|------------|--------|----------|
| TRIS     | 98661CLMBM107GR | Map 45.61944 | -122.64167 |        | 200m     |
| AFS/AIRS | WA0955685       | Map 45.61944 | -122.64167 | TRIS   | 200m     |
| RCRIS-   | WAD009020140    | Map 45.61944 | -122.64167 | TRIS   | 200m     |



Overrode Pgm 45.58056 -121.35639 ?  
RCRIS- ORD009416462 Map 45.58163 -122.64260 150m

FacUIN: 110000816975 Name: HPC SCIENTIFIC AND TECHNOLOGY INCORPORATED  
Addr: 2730 NE RIVERSIDE WY, PORTLAND, OR. 972111848  
Pgm Pgm ID Lat Long LocSrc Accuracy  
RCRIS\* ORD107968182 Map 45.58123 -122.63643 150m

FacUIN: 110000827026 Name: VANCOUVER CITY BLANDFORD STATION  
Addr: 4415 E 5TH ST, VANCOUVER, WA. 986615501  
Pgm Pgm ID Lat Long LocSrc Accuracy  
RCRIS\* WA0000061879 Map 45.62015 -122.62153 150m

FacUIN: 110000829685 Name: TIDEWATER INDUSTRIAL CENTER  
Addr: 6305 NW LOWER RIVER RD, VANCOUVER, WA. 98660  
Pgm Pgm ID Lat Long LocSrc Accuracy  
RCRIS\* WAD988521043 Map 45.66837 -122.74484 150m

FacUIN: 110000894541 Name: RHONE POULENC BASIC CHEMICALS  
Addr: 4429 N SUTTLE RD, PORTLAND, OR. 972177719  
Pgm Pgm ID Lat Long LocSrc Accuracy  
TRIS 97217STFFR4429N Map 45.61534 -122.71050 150m  
AFS/AIRS OR0041284 Map 45.61534 -122.71050 150m  
RCRIS\* ORD009025347 Map 45.61534 -122.71050 150m

FacUIN: 110000894578 Name: PRECISION EQUIPMENT INCORPORATED  
Addr: 8440 N KERBY AV, PORTLAND, OR. 972171017  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0995444 Map 45.58491 -122.67088 RCRAINFO 150m  
RCRIS\* ORD061491882 Map 45.58491 -122.67088 150m

FacUIN: 110000894596 Name: SPECIALTY ENAMELING SVC INCORPORATED  
Addr: 8205 N MISS AV, PORTLAND, OR. 972171166  
Pgm Pgm ID Lat Long LocSrc Accuracy  
TRIS 97211SPCLT8205N Map 45.58235 -122.67496  
Overrode Pgm 45.58333 -122.67583 600m  
AFS/AIRS OR0931903 Map 45.58235 -122.67496 RCRAINFO 150m  
RCRIS- ORD079848438 Map 45.58235 -122.67496 150m

FacUIN: 110000894621 Name: PROGRESSIVE INK COMPANY L.L.C.  
Addr: 2985 N MARINE DR, PORTLAND, OR. 972177745  
Pgm Pgm ID Lat Long LocSrc Accuracy  
TRIS 97217CZINKS2985N Map 45.61098 -122.69362 150m  
AFS/AIRS OR0998078 Map 45.61098 -122.69362 RCRAINFO 150m  
PCS ORG250003 Map 45.61098 -122.69362  
Overrode Pgm 45.61250 -122.70139 ?  
RCRIS- ORD092887033 Map 45.61098 -122.69362 150m

FacUIN: 110000901347 Name: FORT JAMES OPERATING COMPANY  
Addr: 3400 N MARINE DR, PORTLAND, OR. 972177746  
Pgm Pgm ID Lat Long LocSrc Accuracy  
TRIS 97217JMSRV3400A Map 45.61278 -122.69961 150m



|          |                 |                         |      |
|----------|-----------------|-------------------------|------|
| TRIS     | 97217JMSRV3400N | Map 45.61278 -122.69961 | 150m |
| AFS/AIRS | OR0764089       | Map 45.61278 -122.69961 | 150m |
| PCS      | OR0000400       | Map 45.61278 -122.69961 | 150m |
| RCRIS*   | ORD009042854    | Map 45.61278 -122.69961 | 150m |

FacUIN: 110000901392 Name: LACAMAS LABORATORIES INCORPORATED

Addr: 3625 N SUTTLE RD, PORTLAND, OR. 972177713

|        |              |              |            |        |          |
|--------|--------------|--------------|------------|--------|----------|
| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
| RCRIS* | ORD982652463 | Map 45.61341 | -122.70523 |        | 150m     |

FacUIN: 110000901980 Name: BOOMSNUB CORPORATION

Addr: 3611 NE 68TH ST, VANCOUVER, WA. 986651371

|          |              |              |            |          |          |
|----------|--------------|--------------|------------|----------|----------|
| Pgm      | Pgm ID       | Lat          | Long       | LocSrc   | Accuracy |
| AFS/AIRS | WA0970775    | Map 45.67231 | -122.63134 | RCRAINFO | 2000m    |
| RCRIS*   | WA0000380212 | Map 45.67231 | -122.63134 |          | 2000m    |

FacUIN: 110000905575 Name: CENEX PETROLEUM TERMINAL

Addr: 5420 FRUIT VALLEY RD, VANCOUVER, WA. 986601246

|          |              |              |            |        |          |
|----------|--------------|--------------|------------|--------|----------|
| Pgm      | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
| AFS/AIRS | WA0961724    | Map 45.64930 | -122.69084 |        |          |
|          | Override Pgm | 45.66194     | -122.69194 |        | ?        |
| RCRIS*   | WAD988475679 | Map 45.64930 | -122.69084 |        | 150m     |

FacUIN: 110000912503 Name: US DOE BPA ROSS COMPLEX

Addr: 5411 NE HWY 99, VANCOUVER, WA. 986631302

|        |              |              |            |        |          |
|--------|--------------|--------------|------------|--------|----------|
| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
| RCRIS* | WA1891406349 | Map 45.66209 | -122.66401 |        | 150m     |

FacUIN: 110000916144 Name: BOISE CASCADE CORP

Addr: 907 W 7TH ST, VANCOUVER, WA. 986603066

|          |                 |              |            |        |          |
|----------|-----------------|--------------|------------|--------|----------|
| Pgm      | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
| TRIS     | 98660BSCSC907WS | Map 45.62611 | -122.68028 |        |          |
|          | Override Pgm    | 45.62672     | -122.67926 |        | 150m     |
| AFS/AIRS | WA0750092       | Map 45.62611 | -122.68028 |        |          |
|          | Override Pgm    | 45.62672     | -122.67926 |        | 150m     |
| AFS/AIRS | WA0953493       | Map 45.62611 | -122.68028 | PCS    | 26m      |
| PCS      | WA0000264       | Map 45.62611 | -122.68028 |        | 26m      |

FacUIN: 110001133568 Name: GRAPHIC SCIENCES INCORPORATED

Addr: 2669 NE RIVERSIDE WY, PORTLAND, OR. 972111845

|        |                 |              |            |        |          |
|--------|-----------------|--------------|------------|--------|----------|
| Pgm    | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
| TRIS   | 97211GRPHC2669N | Map 45.58132 | -122.63681 |        | 150m     |
| RCRIS- | OR0000123786    | Map 45.58132 | -122.63681 |        | 150m     |

FacUIN: 110001133773 Name: DISCOVERY SPAS INCORPORATED

Addr: 2625 SE HIDDEN WY, VANCOUVER, WA. 98661

|        |                 |              |            |        |          |
|--------|-----------------|--------------|------------|--------|----------|
| Pgm    | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
| TRIS   | 98661DSCVR2503S | Map 45.61488 | -122.63910 |        | 150m     |
| RCRIS- | WAH000000554    | Map 45.61488 | -122.63910 |        |          |
|        | Override Pgm    | 45.61469     | -122.64031 |        | ?        |

FacUIN: 110001653675 Name: HERBERT MALARKEY ROOFING COMPANY



Addr: 3131 N COLUMBIA BLVD, PORTLAND, OR. 972177472  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0040672 Map 45.58929 -122.69747 150m  
PCS ORG250024 Map 45.58929 -122.69747 .  
Override Pgm 45.58917 -121.30167 ?

FacUIN: 110001653737 Name: VARICAST INCORPORATED  
Addr: 866 N COLUMBIA BLVD, PORTLAND, OR. 97217  
Pgm Pgm ID Lat Long LocSrc Accuracy  
TRIS 97217VNRCH866NC Map 45.58406 -122.67371 150m  
AFS/AIRS OR0040792 Map 45.58406 -122.67371 .  
Override Pgm 45.58400 -122.67370 150m  
RCRIS- ORD009028572 Map 45.58406 -122.67371 .  
Override Pgm 45.58400 -122.67370 150m

FacUIN: 110001653808 Name: SUPREME PERLITE COMPANY  
Addr: 4600 N SUTTLE RD, PORTLAND, OR. 972177720  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0041068 Map 45.61572 -122.71164 150m

FacUIN: 110001653906 Name: FAUBION ELEMENTARY SCHOOL  
Addr: 3000 NE DEKUM ST, PORTLAND, OR. 972116615  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0041861 Map 45.57208 -122.63337 150m

FacUIN: 110001653951 Name: PORTSMOUTH MIDDLE SCHOOL  
Addr: 5103 N WILLIS BLVD, PORTLAND, OR. 972033464  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0042059 Map 45.58433 -122.71796 150m

FacUIN: 110001653997 Name: WOODLAWN ELEMENTARY SCHOOL  
Addr: 7200 NE 11TH AV, PORTLAND, OR. 972114012  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0042174 Map 45.57560 -122.65236 150m

FacUIN: 110001656351 Name: HARBOR OIL  
Addr: 11535 N FORCE AV, PORTLAND, OR. 972177735  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0764186 Map 45.60638 -122.69128 150m  
RCRIS- ORD071803985 Map 45.60638 -122.69128 150m

FacUIN: 110001656379 Name: COLUMBIA STEEL SHELVING  
Addr: 2665 NE RIVERSIDE WY, PORTLAND, OR. 972111845  
Pgm Pgm ID Lat Long LocSrc Accuracy  
TRIS 97211CLMBS2665N Map 45.58132 -122.63683 150m  
AFS/AIRS OR0764188 Map 45.58132 -122.63683 150m  
RCRIS- ORD106557531 Map 45.58132 -122.63683 150m

FacUIN: 110001656413 Name: FUEL PROCESSORS INCORPORATED  
Addr: 4150 N SUTTLE RD, PORTLAND, OR. 972177717  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS OR0764196 Map 45.61464 -122.70869 150m



RCRIS- ORD000711929 Map 45.61464 -122.70869  
 Override Pgm 0.00000 0.00000 ?  
 RCRIS- ORD980975692 Map 45.61464 -122.70869 150m

FacUIN: 110001657261 Name: HYUNDAI MOTOR AMERICA  
 Addr: 8235 N MARINE DR, PORTLAND, OR. 972036457  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 AFS/AIRS OR0766481 Map 45.63801 -122.75595 150m

FacUIN: 110001657476 Name: GRANPAC FOODS INCORPORATED  
 Addr: 7124 N MARINE DR, PORTLAND, OR. 972036480  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 AFS/AIRS OR0807182 Map 45.62781 -122.73886 150m

FacUIN: 110001657662 Name: FISHER MILLS INCORPORATED  
 Addr: 5325 N MARINE DR, PORTLAND, OR. 972036435  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 AFS/AIRS OR0915973 Map 45.61350 -122.71119 150m

FacUIN: 110001916231 Name: UNITED GRAIN  
 Addr: ?, ?, WA. 986611025  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 AFS/AIRS WA0750076 Map 45.67434 -122.61280 1000m  
 RCRIS- WAR000004424 Map 45.67434 -122.61280  
 Override Pgm 45.63000 -122.69056 ?

FacUIN: 110001916240 Name: GREAT WESTERN MALTING  
 Addr: 1701 W INDUSTRIAL WY, VANCOUVER, WA. 98660  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 TRIS 98660GRTWSFOOTO Map 45.63071 -122.68745 150m  
 AFS/AIRS WA0750077 Map 45.63071 -122.68745  
 Override Pgm 45.63056 -122.69083 ?  
 PCS WA0000019 Map 45.63071 -122.68745  
 Override Pgm 45.63111 -122.69417 ?  
 RCRIS- WAD026961870 Map 45.63071 -122.68745  
 Override Pgm 45.63039 -122.68858 ?

FacUIN: 110001916259 Name: VANPORT INDUSTRIES  
 Addr: ELEVATOR WAY, VANCOUVER, WA. 98660  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 AFS/AIRS WA0750083 Map 45.63194 -122.69333 ?

FacUIN: 110001916286 Name: VANCOUVER WWTP  
 Addr: 1800 KOTOBUKI WY, VANCOUVER, WA. 986601308  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 AFS/AIRS WA0750086 Map 45.64007 -122.69165 150m

FacUIN: 110001916295 Name: AUTOMOTIVE SERVICES  
 Addr: 2001 W 4TH PLAIN BLVD, VANCOUVER, WA. 986601313  
 Pgm Pgm ID Lat Long LocSrc Accuracy  
 AFS/AIRS WA0750087 Map 45.64049 -122.68782 150m  
 RCRIS- WAD061487419 Map 45.64049 -122.68782 150m



FacUIN: 110001916302 Name: FRITO LAY

Addr: 4808 FRUIT VALLEY RD, VANCOUVER, WA. 986601242

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------------|--------------|------------|--------|----------|
| TRIS     | 98660FRTLY4808N | Map 45.64853 | -122.69087 |        | 150m     |
| AFS/AIRS | WA0750089       | Map 45.64853 | -122.69087 |        | 150m     |
| RCRIS-   | WAD061493789    | Map 45.64853 | -122.69087 |        | 150m     |

FacUIN: 110001916963 Name: PORTCO CORPORATION POLYETHYLENE DIVISION

Addr: ?, ?, WA. 986618025

| Pgm      | Pgm ID       | Lat          | Long       | LocSrc   | Accuracy |
|----------|--------------|--------------|------------|----------|----------|
| AFS/AIRS | WA1001013    | Map 45.61650 | -122.63922 | RCRAINFO | 6000m    |
| RCRIS*   | WAD988505459 | Map 45.61650 | -122.63922 |          | 6000m    |

FacUIN: 110001917230 Name: ST. SERVICES

Addr: 3301 LOWER RIVER ROAD, VANCOUVER, WA. 986661207

| Pgm      | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------|--------------|------------|--------|----------|
| AFS/AIRS | WA0955691 | Map 45.63667 | -122.70222 |        | ?        |

FacUIN: 110002058362 Name: G L & V LAVALLEY INDUSTRIES INCORPORATED

Addr: 7316 NE 47TH AV, VANCOUVER, WA. 986611326

| Pgm    | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------|--------------|------------|--------|----------|
| TRIS   | 98661LVLLY7316N | Map 45.67543 | -122.62178 |        | 150m     |
| RCRIS- | WAD988471686    | Map 45.67543 | -122.62178 |        | 150m     |

FacUIN: 110002058479 Name: COLUMBIA ALUMINUM RECYCLING CORPORATION

Addr: 866 N COLUMBIA BLVD, PORTLAND, OR. 972171104

| Pgm      | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------|--------------|------------|--------|----------|
| AFS/AIRS | OR0790872 | Map 45.58400 | -122.67370 |        | 150m     |

FacUIN: 110002063622 Name: BOOMSNUB AIRCO SUPERFUND SITE

Addr: 7608 NE 47TH AV, VANCOUVER, WA. 98661

| Pgm    | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------|--------------|------------|--------|----------|
| TRIS   | 98661BMSNB7608N | Map 45.67720 | -122.62176 |        | 150m     |
| RCRIS- | WA0000263301    | Map 45.67720 | -122.62176 |        | 150m     |
| RCRIS- | WA0000263319    | Map 45.67720 | -122.62176 |        | 150m     |
| RCRIS* | WAD009624453    | Map 45.67720 | -122.62176 |        | 150m     |

FacUIN: 110002149069 Name: PACKAGING RESOURCES CO

Addr: 4715 N. COLUMBIA BLVD., PORTLAND, OR. 97203

| Pgm    | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------------|--------------|------------|--------|----------|
| TRIS   | 97203PCKGN4715N       | Map 45.59290 | -122.70930 |        | 200m     |
| RCRIS- | ORD987175452          | Map 45.59290 | -122.70930 |        | -        |
|        | Overrode Pgm 45.59363 | -122.71348   |            |        | 150m     |

FacUIN: 110002149167 Name: SCHULER CORPORATION PLANT III

Addr: 2515 NE RIVERSIDE WAY, PORTLAND, OR. 97211

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 97211SCHLR2515N | Map 45.58145 | -122.63773 |        | 150m     |

FacUIN: 110002149176 Name: SPE DE WAY PRODUCTS INCORPORATED

Addr: 8000 NE 14TH PL, PORTLAND, OR. 972111624



| Pgm   | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|-------|-----------------|--------------|------------|--------|----------|
| TRIS  | 97211SPDWY8000N | Map 45.58053 | -122.64915 |        | 150m     |
| RCRIS | ORD009024829    | Map 45.58053 | -122.64915 |        | 150m     |
| RCRIS | ORD980836761    | Map 45.58053 | -122.64915 |        | 150m     |

FacUIN: 110002149210 Name: TECHNAFLOW INCORPORATED ROVALVE DIVISION  
 Addr: 1945 N COLUMBIA BLVD, PORTLAND, OR. 972176762

| Pgm   | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|-------|-----------------|--------------|------------|--------|----------|
| TRIS  | 97217RVNGN1945N | Map 45.58556 | -122.68476 |        | 150m     |
| RCRIS | ORD080071566    | Map 45.58556 | -122.68476 |        | 150m     |

FacUIN: 110002150877 Name: FORT VANCOUVER PLYWOOD CO  
 Addr: 2101 W 16TH ST, VANCOUVER, WA. 986601034

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 98660FRTVN2101W | Map 45.63363 | -122.69246 |        | 150m     |

FacUIN: 110002150886 Name: FIBERGLASS MAINTENANCE CONTRACTORS INCORPORATED  
 Addr: 2300 E 3RD ST LP, VANCOUVER, WA. 986617755

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 98661FBRGL2300E | Map 45.62344 | -122.64558 |        | 150m     |

FacUIN: 110002150895 Name: ASC COLAMCO  
 Addr: 2400 N.E. 65TH AVE., SUITE 1, BLDG. 2, VANCOUVER, WA. 98661

| Pgm   | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|-------|-----------------------|--------------|------------|--------|----------|
| TRIS  | 98661SCCLM2400N       | Map 45.63934 | -122.60346 |        | 150m     |
| RCRIS | WAD988482253          | Map 45.63934 | -122.60346 |        |          |
|       | Overrode Pgm 45.63943 | -122.60353   |            |        | 150m     |

FacUIN: 110002150902 Name: NALCO CHEMICAL CO  
 Addr: 5210 FRUIT VALLEY RD, VANCOUVER, WA. 986601245

| Pgm   | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|-------|-----------------|--------------|------------|--------|----------|
| TRIS  | 98663NLCCH5210N | Map 45.64910 | -122.69084 |        | 150m     |
| RCRIS | WAD980981286    | Map 45.64910 | -122.69084 |        | 150m     |

FacUIN: 110002150948 Name: LIFELAST INCORPORATED  
 Addr: 3315 NE 112TH. AVE; SUITE 82, VANCOUVER, WA. 98682

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 98682LFLST3315N | Map 45.64639 | -122.55667 |        | ?        |

FacUIN: 110002346952 Name: VANCOUVER EXTRUSION COMPANY INCORPORATED  
 Addr: 5509 NW LOWER RIVER RD, VANCOUVER, WA. 986601031

| Pgm   | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|-------|-----------------|--------------|------------|--------|----------|
| TRIS  | 98660VNCVR5509N | Map 45.65907 | -122.73944 |        | 150m     |
| RCRIS | WAD009045279    | Map 45.65907 | -122.73944 |        | 150m     |
| RCRIS | WAD104070222    | Map 45.65907 | -122.73944 |        | 150m     |

FacUIN: 110002347149 Name: MORRISON OIL COMPANY INCORPORATED  
 Addr: 3747 N SUTTLE RD, PORTLAND, OR. 972177731

| Pgm  | Pgm ID                | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------------|--------------|------------|--------|----------|
| TRIS | 97217MRRSN3747N       | Map 45.61370 | -122.70603 |        | 150m     |
| PCS  | ORG340011             | Map 45.61370 | -122.70603 |        |          |
|      | Overrode Pgm 45.61194 | -122.68806   |            |        | ?        |



RCRIS- ORD027695097 Map 45.61370 -122.70603 TRIS 150m

FacUIN: 110002349726 Name: DOORCRAFT MFG.

Addr: 3201 NW LOWER RIVER RD, VANCOUVER, WA. 986601028

| Pgm    | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------|--------------|------------|--------|----------|
| TRIS   | 98666DRCRF3201N | Map 45.64311 | -122.70095 |        | 150m     |
| RCRIS- | WAD071824080    | Map 45.64311 | -122.70095 |        | 150m     |

FacUIN: 110002441180 Name: CEREAL FOOD PROCESSORS, INC.

Addr: N LOMBARD ST (TERMINAL 4), PORTLAND, OR. 97203

| Pgm      | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|----------|--------------|--------------|------------|--------|----------|
| AFS/AIRS | OR0040778    | Map 45.60865 | -122.74540 |        |          |
|          | Override Pgm | 45.60000     | -122.77556 |        | ?        |
| RCRIS-   | ORR000000992 | Map 45.60865 | -122.74540 |        | 11000m   |

FacUIN: 110002466509 Name: NORTHWEST PACKING COMPANY

Addr: 1701 WEST 16TH STREET, VANCOUVER, WA. 98660

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 98666NRTHW16THA | Map 45.63750 | -122.68889 |        | 200m     |

FacUIN: 110004777411 Name: ST JOHNS JUNCTION P L DELIVERY FAC

Addr: ?, ?, OR. 97203

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| RCRIS* | ORD000641993 | Map 45.60865 | -122.74540 |        | 11000m   |

FacUIN: 110004778063 Name: BRITE SOL SERVICES INC

Addr: 10145 N NORTH PORTLAND RD, PORTLAND, OR. 972031381

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| RCRIS* | ORD004872404 | Map 45.59535 | -122.72456 |        | 150m     |
| RCRIS- | ORD009130535 | Map 45.59445 | -122.70592 |        | 150m     |

FacUIN: 110004785260 Name: ROLLINS LEASING CORP

Addr: ONE NE COLUMBIA BLVD, PORTLAND, OR. 97211

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| PCS    | ORG910038    | Map 45.57722 | -122.66667 |        | ?        |
| RCRIS- | ORD065262628 | Map 45.57722 | -122.66667 | PCS    | ?        |

FacUIN: 110004791128 Name: SUPERIOR STRIPPING SERVICES

Addr: 9940 N VANCOUVER WY, PORTLAND, OR. 972177524

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc   | Accuracy |
|--------|--------------|--------------|------------|----------|----------|
| RCRIS* | ORD980980312 | Map 45.59424 | -122.66471 |          | 150m     |
| RCRIS- | ORQ000004713 | Map 45.62876 | -122.74055 | RCRAINFO | 150m     |

FacUIN: 110004805113 Name: CASE POWER & EQUIPMENT AKA CASE CORP

Addr: 1745 NE COLUMBIA BLVD, PORTLAND, OR. 97211

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| PCS    | ORG910018    | Map 45.57758 | -122.64605 |        |          |
|        | Override Pgm | 45.57750     | -122.64722 |        | ?        |
| RCRIS- | ORD987196581 | Map 45.57758 | -122.64605 |        | 150m     |

FacUIN: 110005303974 Name: TIME OIL CO NE CHERRY DR

Addr: 2818 NE CHERRY DR, VANCOUVER, WA. 98663



| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| PCS    | WA0040967    | Map 45.65098 | -122.63890 |        | .        |
|        | Override Pgm | 45.65111     | -122.64056 |        | ?        |
| RCRIS- | WA0000183111 | Map 45.65098 | -122.63890 |        | 150m     |

FacUIN: 110005311224 Name: TESORO WEST COAST CO VANCOUVER TERMINAL

Addr: 2211 NW 26TH ST EX, VANCOUVER, WA. 98660

| Pgm      | Pgm ID          | Lat          | Long       | LocSrc   | Accuracy |
|----------|-----------------|--------------|------------|----------|----------|
| TRIS     | 98666TSRWS2211W | Map 45.64070 | -122.69366 |          | .        |
|          | Override Pgm    | 45.63750     | -122.69583 |          | ?        |
| AFS/AIRS | WA0931936       | Map 45.64070 | -122.69366 |          | .        |
|          | Override Pgm    | 45.64058     | -122.69293 |          | ?        |
| RCRIS-   | WAD000641761    | Map 45.64070 | -122.69366 |          | 150m     |
| RCRIS*   | WAD000711556    | Map 45.64070 | -122.69366 |          | 150m     |
| RCRIS-   | WAH000012187    | Map 45.63066 | -122.68185 | RCRAINFO | 150m     |

FacUIN: 110005394493 Name: SEAFAB METALS COMPANY

Addr: 3201 LOWER RIVER ROAD, VANCOUVER, WA. 98660

| Pgm    | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|--------|-----------------|--------------|------------|--------|----------|
| TRIS   | 98660FBRCTBLDG2 | Map 45.64361 | -122.70694 |        | ?        |
| RCRIS- | WAH000007476    | Map 45.64361 | -122.70694 |        | .        |
|        | Override Pgm    | 45.64256     | -122.70350 |        | ?        |

FacUIN: 110006138170 Name: BELLS VELVET HAMMER INC

Addr: 10803 NE HWY 99, VANCOUVER, WA. 986865616

| Pgm      | Pgm ID       | Lat          | Long       | LocSrc   | Accuracy |
|----------|--------------|--------------|------------|----------|----------|
| AFS/AIRS | WA0989293    | Map 45.69757 | -122.65289 | RCRAINFO | 150m     |
| RCRIS-   | WAD057075889 | Map 45.69757 | -122.65289 |          | 150m     |

FacUIN: 110006684711 Name: SEH AMERICA INC

Addr: 1971 W MADRONA WAY, VANCOUVER, WA. 98660

| Pgm | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|-----|-----------|--------------|------------|--------|----------|
| PCS | WA0039616 | Map 45.65167 | -122.55667 |        | ?        |

FacUIN: 110006685284 Name: HOLNAM INC

Addr: 12174 W 8TH, VANCOUVER, WA. 98660

| Pgm | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|-----|-----------|--------------|------------|--------|----------|
| PCS | WA0000329 | Map 45.61667 | -122.65305 |        | ?        |

FacUIN: 110006696021 Name: P C DEVELOPMENT INC

Addr: ?, ?, OR. 97217

| Pgm | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|-----|-----------|--------------|------------|--------|----------|
| PCS | OR0033987 | Map 45.58188 | -122.68993 |        | 11000m   |

FacUIN: 110007169394 Name: PORTLAND PROVISION C

Addr: COLUMBIA & PENINSULA, PORTLAND, OR. 97217

| Pgm      | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|----------|-----------|--------------|------------|--------|----------|
| AFS/AIRS | OR0041081 | Map 45.58880 | -122.69590 |        | 1000m    |

FacUIN: 110007328882 Name: FORT VANCOUVER PLYWOOD

Addr: 2101 W. 16TH ST., VANCOUVER, WA. 98660

| Pgm | Pgm ID | Lat | Long | LocSrc | Accuracy |
|-----|--------|-----|------|--------|----------|
|-----|--------|-----|------|--------|----------|



AFS/AIRS WA0750079 Map 45.63111 -122.68306 ?

FacUIN: 110007575846 Name: DARLING DELAWARE COMPANY INCORPORATED  
Addr: FOOT OF NORTH HURST AVENUE, PORTLAND, OR. 97217

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 97217DRLNGFOOTO | Map 45.59444 | -122.70639 |        | 200m     |

FacUIN: 110008062504 Name: ALBINA ASPHALT VANCOUVER ICE & FUEL  
Addr: 1112 W. 7TH ST., VANCOUVER, WA. 98660

| Pgm  | Pgm ID          | Lat          | Long       | LocSrc | Accuracy |
|------|-----------------|--------------|------------|--------|----------|
| TRIS | 98660LBNSP1112W | Map 45.62639 | -122.68194 |        | ?        |
| PCS  | WA0039918       | Map 45.62639 | -122.68194 | TRIS   | ?        |

FacUIN: 110008216279 Name: ST SERVICES TERMINAL 2  
Addr: ?, ?, ?. ?

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| RCRIS* | WAD050956671 | Map 45.62464 | -122.67808 |        | ?        |

FacUIN: 110009316980 Name: VANCOUVER WATER STATION #4 CONTAMINATION  
Addr: 5TH + BLANDFORD ST, VANCOUVER, WA. 98661

| Pgm     | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|---------|--------------|--------------|------------|--------|----------|
| CERCLIS | WAD988475158 | Map 45.61950 | -122.62247 |        | 5m       |

FacUIN: 110009323142 Name: ALLIED PLATING, INC.  
Addr: 8135 NE M L KING BLVD, PORTLAND, OR. 972111339

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| RCRIS* | ORD009051442 | Map 45.58184 | -122.66010 |        | 150m     |

FacUIN: 110009513017 Name: PACIFIC ANOTECH INC  
Addr: 3209 NW LOWER RIVER RD, VANCOUVER, WA. 986601028

| Pgm    | Pgm ID       | Lat          | Long       | LocSrc | Accuracy |
|--------|--------------|--------------|------------|--------|----------|
| RCRIS* | WAR000005744 | Map 45.64314 | -122.70098 |        | 150m     |

FacUIN: 110009763773 Name: NORTHWEST PACKING CO  
Addr: 16TH & SIMPSON STREETS, VANCOUVER, WA. 98660

| Pgm | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|-----|-----------|--------------|------------|--------|----------|
| PCS | WA0039101 | Map 45.63222 | -122.68972 |        | ?        |

FacUIN: 110009764530 Name: VANCOUVER, CITY OF  
Addr: WESTSIDE WWTP, VANCOUVER, WA. 98660

| Pgm | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|-----|-----------|--------------|------------|--------|----------|
| PCS | WA0024350 | Map 45.63556 | -122.69306 |        | 26m      |

FacUIN: 110009764549 Name: VANCOUVER, CITY OF  
Addr: MARINE PARK WATER RECLAMATION, VANCOUVER, WA. 98661

| Pgm | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|-----|-----------|--------------|------------|--------|----------|
| PCS | WA0024368 | Map 45.61528 | -122.61944 |        | 26m      |

FacUIN: 110009818233 Name: OREGON WASTE SYSTEMS INC  
Addr: 2360 N MARINE DRIVE, PORTLAND, OR. 97218

| Pgm | Pgm ID    | Lat          | Long       | LocSrc | Accuracy |
|-----|-----------|--------------|------------|--------|----------|
| PCS | ORG910050 | Map 45.60833 | -122.68750 |        | ?        |



FacUIN: 110010135549 Name: GATX TERMINALS CORP  
Addr: PORT OF VANCOUVER TERMINAL 2, VANCOUVER, WA. 98666  
Pgm Pgm ID Lat Long LocSrc Accuracy  
PCS WA0000418 Map 45.63583 -122.71056 ?

FacUIN: 110010381979 Name: CREATIVE ENVIRONMENTAL TECHNOLOGIES INC  
Addr: ?, ?, OR. 97217  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS AK0911692 Map 45.58188 -122.68993 11000m

FacUIN: 110010409450 Name: PACIFIC COGENERATION  
Addr: W 11TH ST, VANCOUVER, WA. 98660  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS WA0782860 Map 45.63056 -122.69083 ?

FacUIN: 110010409469 Name: LAVALLEY IND PLAST  
Addr: ?, ?, WA. 986602879  
Pgm Pgm ID Lat Long LocSrc Accuracy  
AFS/AIRS WA0912923 Map 45.63244 -122.67572 1000m

FacUIN: 110010896833 Name: NORTHWEST PACKING CO  
Addr: ?, ?, ?. ?  
Pgm Pgm ID Lat Long LocSrc Accuracy  
PCS WA0042064 Map 45.63222 -122.68972 ?

FacUIN: 110010901426 Name: ENERGY, DEPARTMENT OF  
Addr: ?, ?, ?. ?  
Pgm Pgm ID Lat Long LocSrc Accuracy  
PCS WAS025909 Map 45.66611 -122.64583 ?

FacUIN: 110010906939 Name: CLARK CNTY PW  
Addr: ?, ?, ?. ?  
Pgm Pgm ID Lat Long LocSrc Accuracy  
PCS WAG501022 Map 45.62028 -122.61028 ?

Envfacts Facility Report completed...

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\*\* Human Health Factors/Concerns \*\*

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#### Population Factors Using 2000 Census Data

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#### Approximate Population and Demographic Analysis

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##### Notes:

- 1) Based on summing Census Tract/Block centroids within distance ranges.  
A portion of actual block may extend beyond distance (overcount),  
or portions of some blocks may be within distance but centroid  
is outside (undercount). Usually within 5% in the 1 to 5 mile range.
- 2) The Hispanic Origin category is defined as an ethnic category, not as a



race in the official Census definitions. Hispanic Origin may include counts from any of the Census race categories including White. PL94-171 Census data included a cross tabulation of origin versus race. Our definition for Total People of Color is Total Population - White Non-Hispanic as tabulated in the PL94-171 data. The individual race summaries are also complicated by the fact that Cen2000 allows individuals to be more than one race. We have summarized using the "only" category and did not include the mixture counts, thus the percentages will usually not add up to 100 %.

Distance Range 0 to 1 mile(s):

-----  
413 Census Tract/Block Centroids within area

Total Population = 14399                      Comparison

ID,OR,WA  
Stats

|                |   |       |       |       |
|----------------|---|-------|-------|-------|
| By Race: White | = | 12169 | 84.5% | 84.3% |
| Black          | = | 392   | 2.7%  | 2.3%  |
| Amlnd_Eskimo   | = | 173   | 1.2%  | 1.4%  |
| Asian          | = | 362   | 2.5%  | 4.1%  |
| Haw_PacIs      | = | 78    | 0.5%  | 0.3%  |
| Other          | = | 636   | 4.4%  | 4.1%  |

By Origin: Hispanic Org = 1324    9.2%    7.7%

Total People of Color = 2733    19.0%    18.5%    See note 2.

Average Pop Density per sq mi = 4583 (Centroids/Described Area)

Distance Range 0 to 5 mile(s):

-----  
2894 Census Tract/Block Centroids within area

Total Population = 167799                      Comparison

ID,OR,WA  
Stats

|                |   |        |       |       |
|----------------|---|--------|-------|-------|
| By Race: White | = | 137818 | 82.1% | 84.3% |
| Black          | = | 9010   | 5.4%  | 2.3%  |
| Amlnd_Eskimo   | = | 1840   | 1.1%  | 1.4%  |
| Asian          | = | 5440   | 3.2%  | 4.1%  |
| Haw_PacIs      | = | 824    | 0.5%  | 0.3%  |
| Other          | = | 6110   | 3.6%  | 4.1%  |

By Origin: Hispanic Org = 12603    7.5%    7.7%

Total People of Color = 34853    20.8%    18.5%    See note 2.

Average Pop Density per sq mi = 2133 (Centroids/Described Area)

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Groundwater Sole Source Aquifer Information

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Site apparently not located within 1 mile of any Sole Source Aquifer areas.

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\*\* Ecosystem/Sensitive Environments Factors/Concerns \*\*

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#### National Park Information

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Site located on or within 1 mile of the Fort Vancouver NHS area.

#### Priority/Sensitive Animals, Plants, and Habitats

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In general, agreements, concerns, and legislative requirements with the providers of the following databases prevent us from plotting and/or analyzing in more detail the sensitive areas and points on maps that may be released to the general public. Contact the local database source for the most recent or further detailed information.

#### State Natural Heritage Databases

Individual State Heritage Programs compile databases containing significant site observations of selected species of concern, including federal and state species listed threatened, endangered, sensitive and other priority species.

#### Washington Priority Habitats and Species

Database from Washington Dept of Fish & Wildlife - Jan 1994. Includes priority habitats and species information. May include DUPLICATE information from the Washington Heritage database. Contact the WDW Data Request Line (Lori Adkins) at 360-902-2543 for more information. SORRY - This database is offline right now!

#### Wetlands Areas

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Portions of any reported wetland area(s) may lay outside of the actual specified distance range.  
Oregon Wetland Database OFFLINE!!!

#### Washington Database from USF&W National Wetlands Inventory (NWI).

Obtained from Washington Dept Ecology in 1992. We are reporting only a subset of wetland type: US EM FO RS SB SS.

Distance Range 0 to 1 mile(s):

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Washington Wetlands (USF&W NWI): 2 within area  
2 Wetland(s) with FWS Code: PEMC and total area of 2.30 acres.

Distance Range 1 to 5 mile(s):  
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Washington Wetlands (USF&W NWI): 479 within area

134 Wetland(s) with FWS Code: PEMC and total area of 924.86 acres.  
12 Wetland(s) with FWS Code: R1USR and total area of 90.09 acres.  
10 Wetland(s) with FWS Code: R1USN and total area of 35.74 acres.  
13 Wetland(s) with FWS Code: PFOC and total area of 102.95 acres.  
21 Wetland(s) with FWS Code: PFOA and total area of 113.89 acres.  
22 Wetland(s) with FWS Code: PSSA and total area of 84.12 acres.  
68 Wetland(s) with FWS Code: PSSC and total area of 418.47 acres.  
20 Wetland(s) with FWS Code: PEM/SSC and total area of 160.26 acres.  
16 Wetland(s) with FWS Code: PEMF and total area of 51.14 acres.  
6 Wetland(s) with FWS Code: PEM/SSA and total area of 53.24 acres.  
9 Wetland(s) with FWS Code: PSS/EMC and total area of 73.97 acres.  
11 Wetland(s) with FWS Code: PSST and total area of 303.87 acres.  
22 Wetland(s) with FWS Code: PEMR and total area of 110.53 acres.  
53 Wetland(s) with FWS Code: PEMA and total area of 452.93 acres.  
15 Wetland(s) with FWS Code: PSSR and total area of 275.05 acres.  
15 Wetland(s) with FWS Code: PEMT and total area of 243.99 acres.  
7 Wetland(s) with FWS Code: L2USR and total area of 25.42 acres.  
2 Wetland(s) with FWS Code: PEM/SSR and total area of 21.22 acres.  
3 Wetland(s) with FWS Code: PEMKCX and total area of 2.44 acres.  
1 Wetland(s) with FWS Code: PFO1C and total area of 1.45 acres.  
2 Wetland(s) with FWS Code: PUSC and total area of 0.91 acres.  
1 Wetland(s) with FWS Code: PFO/SSC and total area of 19.09 acres.  
1 Wetland(s) with FWS Code: PEMCD and total area of 38.62 acres.  
1 Wetland(s) with FWS Code: PEMAD and total area of 14.27 acres.  
2 Wetland(s) with FWS Code: PSS/FOC and total area of 17.07 acres.  
3 Wetland(s) with FWS Code: PEMFX and total area of 3.48 acres.  
3 Wetland(s) with FWS Code: L2USN and total area of 37.05 acres.  
1 Wetland(s) with FWS Code: PEMFx and total area of 2.87 acres.  
2 Wetland(s) with FWS Code: PSS/EMR and total area of 28.64 acres.  
1 Wetland(s) with FWS Code: PEMN and total area of 8.63 acres.  
1 Wetland(s) with FWS Code: PEMCX and total area of 2.46 acres.  
1 Wetland(s) with FWS Code: PEMCS and total area of 2.02 acres.  
Total area of wetlands= 3720.75 acres.

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\*\*\* End of Report \*\*\*  
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